

# Exhibit 1

**UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION**

In the Matter of

**SANTA FE NATURAL TOBACCO COMPANY, INC.** a corporation.

**DOCKET NO. C-3952  
COMPLAINT**

The Federal Trade Commission, having reason to believe that Santa Fe Natural Tobacco Company, Inc., a corporation ("respondent"), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Santa Fe Natural Tobacco Company, Inc. is a New Mexico corporation with its principal office or place of business at 1368 Cerrillos Road, Santa Fe, NM 87505-3507.
2. Respondent has advertised, promoted, offered for sale, sold and distributed cigarettes, including Natural American Spirit tobacco cigarettes and Natural American Spirit herbal cigarettes.
3. The acts and practices of respondent alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.
4. Respondent disseminated or caused to be disseminated advertisements for Natural American Spirit tobacco cigarettes, including but not necessarily limited to the attached Exhibits A through C. These advertisements contain the following statements:
  - (A) "If you use tobacco the way Native Americans intended ...or if you smoke out of choice rather than habit ... **Here is an alternative you should try.**

**100% FREE OF CHEMICAL ADDITIVES  
NATURAL TOBACCO AND CIGARETTES**

*[Depiction of Natural American Spirit cigarettes]*

Made from 100% Chemical-Additive-Free, Whole Leaf, Natural Tobacco and nothing else."

(Exhibit A, June - August 1997 magazine advertisement) (emphasis in original).

(B) "If you smoke *because you enjoy smoking*, Natural American Spirit is the natural tobacco alternative you should try.

*Natural American Spirit cigarettes are made from 100% chemical-additive-free, natural tobacco ... and nothing else.*"

(Exhibit B, Fall 1997 magazine advertisement).

(C) "100% Chemical-Additive-Free

Whole Leaf, Natural Tobacco Products"

(Exhibit C, Winter 1996 - 97 magazine advertisement).

5. Through the means described in Paragraph 4, respondent has represented, expressly or by implication, that smoking Natural American Spirit tobacco cigarettes, because they contain no additives or chemicals, is less hazardous to a smoker's health than smoking otherwise comparable cigarettes that contain additives or chemicals.

6. Through the means described in Paragraph 4, respondent has represented, expressly or by implication, that it possessed and relied upon a reasonable basis that substantiated the representation set forth in Paragraph 5, at the time the representation was made.

7. In truth and in fact, respondent did not possess and rely upon a reasonable basis that substantiated the representation set forth in Paragraph 5, at the time the representation was made. Among other reasons, the smoke from Natural American Spirit tobacco cigarettes, like the smoke from all cigarettes, contains numerous carcinogens and toxins, including tar and carbon monoxide. Therefore, the representation set forth in Paragraph 6 was, and is, false or misleading.

8. The acts and practices of respondent as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this twelfth day of June, 2000, has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary

SEAL:

## Exhibit 2

After five hundred years of White exploitation, there is a very real feeling among some Native people that, now that Whites have taken everything else, we want their religion, too. Louis always spoke of such things as the sacred pipe and the drum as his people's "instruments of worship" and the ceremonies as their "ways of worship." The statement is often made that these "ways of worship" do not constitute a religion. This is usually stated in the positive sense—that these ways are not reliant on a written code and that they are a way of life, as opposed to something outside of daily life. Yet, I believe such statements can lead some people to want to borrow bits and pieces of these ways of worship as spiritual "exercises." Within Native communities, the ceremonies are used to help heal broken families, alcoholism, and all the terrible effects of oppression. It should not surprise us if some Natives are reluctant to welcome Whites who want to use Native sacred instruments of worship because it is now the "spiritually cool" thing to do.

The bridge Louis wanted to create was one of mutual respect. If calling his people's spiritual ways a religion afforded them the same respect as the so-called Great Religions, then he would call them a religion. It bothered him to no end that money was being charged for his people's sacred ceremonies. He likened it to money being charged to take part in a Catholic Mass.

Many aspects of the New Age approach to Native American spirituality both amused and troubled Louis. The idea that picking up a drum and performing certain rituals learned in one or two weekend workshops could make one a shaman was an utterly foreign concept to him. Within most Native traditions, a shaman is one who is chosen or deemed worthy by the spirits. The ease with which some people claimed to have obtained animal spirit guides was also amusing to Louis. Almost everyone today has an eagle, bear, or other equally majestic animal as a guide, but few understand those powers. Bear medicine, for example, was very powerful—something obtained through a dangerous encounter with a bear, or through a lifetime of observing and living and breathing Bear. These days, most people's knowledge of bears is limited to images from Disney cartoons or, at best, from Discovery documentaries; few people are willing to make any effort to learn more—much less to make the sacrifices necessary to obtain and maintain Bear medicine.

Something Louis stressed was that the



First time customers receive **free** shipping and handling on pre-paid orders for a full carton or more. Or send \$1.00 for each sample of the Natural American Spirit® product checked below. Only one sample of each product per household:

- pack of Mild Cigarettes    pack of Regular Filter Cigarettes    pack of Menthol Cigarettes    pack of Non-Filter Cigarettes  
 pouch of rolling tobacco to make my own cigarettes

NAME \_\_\_\_\_ Charge telephone orders for cartons  
STREET \_\_\_\_\_ or for sample orders (\$4) to MC/V:  
CITY/STATE \_\_\_\_\_ ZIP \_\_\_\_\_ 1-(800)-332-5595

Natural American Spirit, PO Box 25140, Santa Fe, NM 87504

SURGEON GENERAL'S WARNING: Cigarette  
Smoke Contains Carbon Monoxide.

SD39

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# THE SECRET TO OUR GREAT TASTING CIGARETTES?

## OUR INGREDIENTS...

If you smoke because you enjoy smoking, Natural American Spirit is the natural tobacco alternative you should try.

Natural American Spirit cigarettes are made from 100% chemical-additive-free natural tobacco... and nothing else. The result is great tobacco flavor, with no chemical after-taste. Discover the slower-burning, longer-lasting, *all-natural* smoking experience already enjoyed by hundreds of thousands of satisfied smokers across America.

Try them yourself—Call today for samples! If you are of legal age to purchase tobacco products, you can order sample packs at only \$1 each (Limit: 1 pack each of Regular, Mild, Menthol, or Non-Filter). We'll also send you a list of retailers in your area who carry Natural American Spirit products.

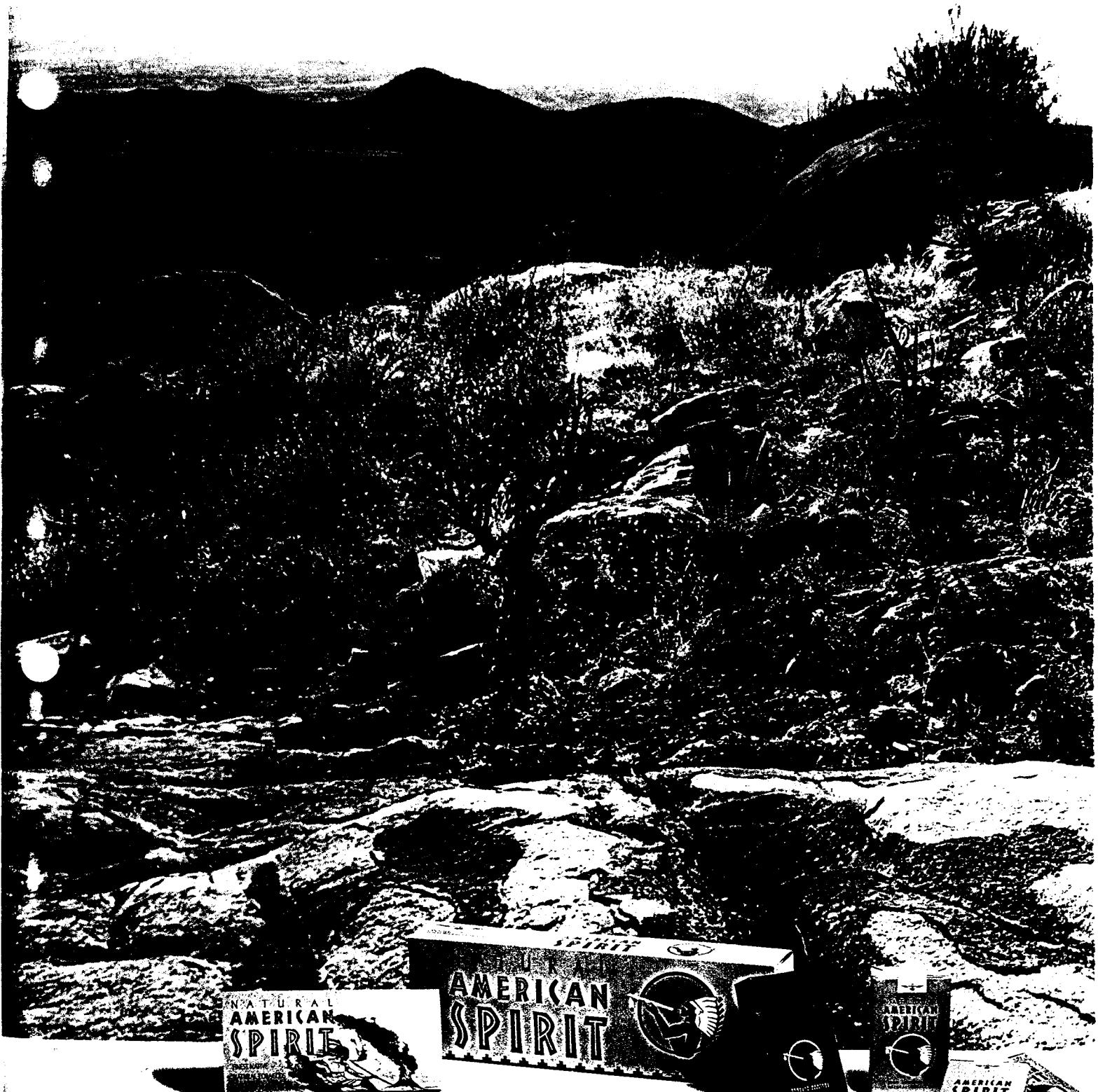
**Natural Tobacco... nothing else. 100% Free of Chemical Additives.**

SURGEON GENERAL'S WARNING: Smoking causes lung cancer, heart disease, emphysema, and other serious diseases.

Exhibit B

Santa Fe Natural

Santa Fe, NM 87504



NATURAL  
**AMERICAN  
SPIRIT**

SURGEON GENERAL  
Causes Lung Cancer,  
Emphysema, And More

**Exhibit C**

100% Chemical-Additive-Free  
Whole Leaf, Natural Tobacco Products

Regular filter, Mild filter, Non-filter,  
and Menthol filter Cigarettes;  
Pouch Tobacco, and Pow-Wow Blend

Find A List of Stores in Your Area Please  
Call 1-800-559-5595 or Send Your Name and Address to:

**NATIONAL TOBACCO COMPANY**  
P.O. Box 140, SANTA FE, NM 87504

# Exhibit 3

**UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:**

Robert Pitofsky, Chairman  
Sheila F. Anthony  
Mozelle W. Thompson  
Orson Swindle  
Thomas B. Leahy

In the Matter of

**SANTA FE NATURAL TOBACCO COMPANY, INC., a corporation.**

**DOCKET NO. C-3952**

**DECISION AND ORDER**

The Federal Trade Commission having initiated an investigation of certain acts and practices of the respondent named in the caption hereof, and the respondent having been furnished thereafter with a copy of a draft of complaint which the Bureau of Consumer Protection proposed to present to the Commission for its consideration and which, if issued by the Commission, would charge respondent with violation of the Federal Trade Commission Act; and

The respondent, its attorney, and counsel for Federal Trade Commission having thereafter executed an agreement containing a consent order, an admission by the respondent of all the jurisdictional facts set forth in the aforesaid draft of complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondent that the law has been violated as alleged in such complaint, or that the facts as alleged in such complaint, other than jurisdictional facts, are true and waivers and other provisions as required by the Commission's Rules; and

The Commission having thereafter considered the matter and having determined that it had reason to believe that the respondent has violated the said Act, and that complaint should issue stating its charges in that respect, and having thereupon accepted the executed consent agreement and placed such agreement on the public record for a period of thirty (30) days, now in further conformity with the procedure prescribed in ♦ 2.34 of its Rules, the Commission hereby issues its complaint, makes the following jurisdictional findings and enters the following order:

1. Respondent Santa Fe Natural Tobacco Company, Inc. is a New Mexico corporation with its principal office or place of business at 1368 Cerrillos Road, Santa Fe, NM 87505-3507.
2. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondent, and the proceeding is in the public interest.

**ORDER**

## DEFINITIONS

For purposes of this order, the following definitions shall apply:

1. "Competent and reliable scientific evidence" shall mean tests, analyses, research, studies, or other evidence based on the expertise of professionals in the relevant area, that has been conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted in the profession to yield accurate and reliable results.
2. Unless otherwise specified, "respondent" shall mean Santa Fe Natural Tobacco Company, Inc., a corporation, its successors and assigns and its officers, agents, representatives, and employees.
3. "Commerce" shall mean as defined in Section 4 of the Federal Trade Commission Act, 15 U.S.C. ♦ 44.
4. "Advertisement" shall mean any written or verbal statement, illustration, or depiction that is designed to effect a sale or create interest in the purchasing of any product, including but not limited to a statement, illustration or depiction in or on a brochure, newspaper, magazine, free standing insert, pamphlet, leaflet, circular, mailer, book insert, letter, coupon, catalog, poster, chart, billboard, transit advertisement, point of purchase display, specialty or utilitarian item, sponsorship material, package insert, film, slide, or the Internet or other computer network or system.
5. "Tobacco product" shall mean cigarettes, cigars, cigarillos, little cigars, smokeless tobacco, cigarette tobacco, pipe tobacco, and any other product made or derived from tobacco that is intended for human consumption, including any component, part, or accessory of a tobacco product.
6. "Herbal smoking product" shall mean cigarettes, cigars, cigarillos, little cigars and any other product made or derived from plant material other than tobacco, that is intended for human smoking, including any component, part, or accessory of an herbal smoking product.
7. "Clearly and prominently" shall mean:
  - a. With regard to advertisements for tobacco and herbal smoking products, in black type on a solid white background, or in white type on a solid red background, or in any other color combination that would provide an equivalent or greater degree of print contrast as objectively determined by densitometer or comparable measurements of the type and the background color. The color of the ruled rectangle shall be the same color as that of the type; and
  - b. (i) With regard to advertisements for tobacco products, centered, both horizontally and vertically, in a ruled rectangle. The area enclosed by the

rectangle shall be no less than 40% of the size of the area enclosed by the ruled rectangle surrounding the health warnings for tobacco cigarettes mandated by 15 U.S.C. ♦ 1333. The width of the rule forming the rectangle shall be no less than 50% of the width of the rule required for the health warnings for tobacco cigarettes mandated by 15 U.S.C. ♦ 1333.

*Provided that*, if, at any time after this order becomes final, 15 U.S.C. ♦ 1333 is amended, modified, or superseded by any other law, the area enclosed by the ruled rectangle shall be no less than 40% of the area required for health warnings for tobacco cigarettes by such amended, modified, or superseding law, and the width of the rule forming the rectangle shall be no less than 50% of the width of any surrounding rule required for health warnings for tobacco cigarettes by such amended, modified, or superseding law; and

(ii) With regard to advertisements for herbal smoking products, centered, both horizontally and vertically, in a ruled rectangle. The area enclosed by the rectangle shall be no less than the size of the area enclosed by the ruled rectangle surrounding the health warnings for tobacco cigarettes mandated by 15 U.S.C. ♦ 1333. The width of the rule forming the rectangle shall be no less than the width of the rule required for the health warnings for tobacco cigarettes mandated by 15 U.S.C. ♦ 1333.

*Provided that*, if, at any time after this order becomes final, 15 U.S.C. ♦ 1333 is amended, modified, or superseded by any other law, the area enclosed by the ruled rectangle shall be no less than the area required for health warnings for tobacco cigarettes by such amended, modified, or superseding law, and the width of the rule forming the rectangle shall be no less than the width of any surrounding rule required for health warnings for tobacco cigarettes by such amended, modified, or superseding law; and

c. In the same type style and type size as that required for health warnings for tobacco cigarettes pursuant to 15 U.S.C. ♦ 1333.

*Provided that*, if, at any time after this order becomes final, 15 U.S.C. ♦ 1333 is amended, modified, or superseded by any other law, the type style and type size of the disclosure shall be the same as the type style and type size required for health warnings for tobacco cigarettes by such amended, modified, or superseding law; and

d. In a clear and prominent location but not immediately next to other written or textual matter or any rectangular designs, elements, or similar geometric forms, including but not limited to any warning statement required under the Federal Cigarette Labeling and Advertising Act, 15 U.S.C. ♦ 1331 *et seq.*, or the Comprehensive Smokeless Tobacco Health Education Act, 15 U.S.C.

♦ 4401 *et seq.* In addition, the disclosure shall not be positioned in the margin of a print advertisement. A disclosure shall be deemed "not immediately next to" other geometric or textual matter if the distance between the disclosure and the other matter is as great as the distance between the outside left edge of the rule of the rectangle enclosing the health warning required by 15 U. S. C. ♦ 1333 and the top left point of the letter "S" in the word "SURGEON" in that health warning; and

e. For audiovisual or audio advertisements, including but not limited to advertisements on videotapes, cassettes, discs, or the Internet; promotional films or filmstrips; and promotional audiotapes or other types of sound recordings, the disclosure shall appear on the screen at the end of the advertisement in the format described above for a length of time and in such a manner that it is easily legible and shall be announced simultaneously at the end of the advertisement in a manner that is clearly audible.

*Provided, however,* that in any advertisement that does not contain a visual component, the disclosure need not appear in visual format, and in any advertisement that does not contain an audio component, the disclosure need not be announced in audio format.

## I.

IT IS ORDERED that respondent, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, promotion, offering for sale, sale, or distribution of Natural American Spirit tobacco cigarettes or any other tobacco product in or affecting commerce, shall display in advertisements as specified below, clearly and prominently, the following disclosures (including the line breaks, punctuation, bold font and capitalization illustrated):

In cigarette advertisements:

No additives in our tobacco  
does **NOT** mean a safer cigarette.

In advertisements for any other tobacco product:

No additives in our tobacco  
does **NOT** mean safer.

These disclosures shall be displayed beginning no later than thirty (30) days after the date of service of this order, in any advertisement that, through the use of such phrases as "no additives," "no chemicals," "additive-free," "chemical-free," "chemical-additive-free," "100% tobacco," "pure tobacco," or substantially similar terms, represents that a tobacco product has no additives or chemicals.

*Provided*, that the above disclosures shall not be required in any cigarette advertisement that is not required to bear a health warning pursuant to 15 U.S.C. ♦ 1333.

*Provided further*, that the above disclosures shall not be required if respondent possesses and relies upon competent and reliable scientific evidence demonstrating that such cigarette or other tobacco product poses materially lower health risks than other cigarettes or other products of the same type.

Nothing contrary to, inconsistent with, or in mitigation of any disclosure provided for in this part shall be used in any advertisement. *Provided, however*, that this provision shall not prohibit respondent from truthfully representing, through the use of such phrases as "no additives," "no chemicals," "additive-free," "chemical-free," "chemical-additive-free," "100% tobacco," "pure tobacco," or substantially similar terms, that a tobacco product has no additives or chemicals, where such representation is accompanied by the disclosure mandated by this provision.

## II.

IT IS FURTHER ORDERED that respondent, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, promotion, offering for sale, sale, or distribution of any herbal smoking product in or affecting commerce, shall display in advertisements and on packaging as specified below, clearly and prominently, the following disclosure (including the line breaks, punctuation and capitalization illustrated):

In advertisements and on packaging for herbal cigarettes:

Herbal cigarettes are dangerous to your health.

They produce tar and carbon monoxide.

In advertisements and on packaging for other herbal smoking products:

Smoking this product is dangerous to your health.

It produces tar and carbon monoxide.

These disclosures shall be displayed beginning no later than thirty (30) days after the date of service of this order, in any advertisement and on any package that, through the use of such phrases as "no tobacco," "tobacco-free," "herbal," or substantially similar terms, represents that an herbal smoking product has no tobacco.

*Provided*, that the above disclosures shall not be required if respondent possesses and relies upon competent and reliable scientific evidence demonstrating that such herbal smoking products do not pose any material health risks.

Nothing contrary to, inconsistent with, or in mitigation of any disclosure provided for in this part shall be used in any advertisement. *Provided, however,* that this provision shall not prohibit respondent from truthfully representing, through the use of such phrases as "no tobacco," "tobacco-free," "herbal," or substantially similar terms, that an herbal smoking product has no tobacco, where such representation is accompanied by the disclosure mandated by this provision.

### III.

IT IS FURTHER ORDERED that respondent shall:

A. Provide, within forty-five (45) days after the date of service of this order, an exact copy of the notice attached hereto as Attachment A to each retailer, distributor, or other purchaser for resale to whom respondent has supplied Natural American Spirit tobacco cigarettes since January 1, 1998. Respondent shall send the notice by first class mail. The mailing shall not include any other documents.

B. Discontinue dealing with any retailer, distributor, or other purchaser for resale once respondent has actual knowledge, or knowledge fairly implied on the basis of objective circumstances, that such retailer, distributor, or other purchaser for resale has continued to use or disseminate any of respondent's advertisements for any of respondent's tobacco products that:

1. represents, through the use of such phrases as "no additives," "no chemicals," "additive-free," "chemical-free," "chemical-additive-free," "100% tobacco," "pure tobacco," or substantially similar terms, that the tobacco products have no additives or chemicals; and

2. does not include the disclosure specified in Part I of this order unless, upon notification by respondent, such retailer, distributor, or other purchaser for resale immediately ceases using or disseminating such advertisements. If, after such notification, respondent obtains actual knowledge, or knowledge fairly implied on the basis of objective circumstances, that such retailer, distributor, or other purchaser for resale has not permanently ceased using or disseminating such advertisements, respondent must immediately and indefinitely, discontinue dealing with such retailer, distributor, or other purchaser for resale, until such time as respondent has obtained written assurance and verified that such retailer, distributor, or other purchaser for resale has permanently ceased using or disseminating such advertisements.

C. For five (5) years after the date of service of this order, maintain and upon request make available to the Federal Trade Commission for inspection and copying:

- (1) copies of all notification letters sent to retailers, distributors, or other purchasers for resale pursuant to subparagraph A of this part; and

(2) copies of all communications with retailers, distributors, or other purchasers for resale pursuant to subparagraph B of this part.

#### IV.

IT IS FURTHER ORDERED that respondent Santa Fe Natural Tobacco Company, Inc., and its successors and assigns, shall, for five (5) years after the last date of dissemination of any representation covered by this order, maintain and upon request make available to the Federal Trade Commission for inspection and copying:

- A. All advertisements and packaging containing the representation;
- B. All materials that were relied upon in disseminating the representation; and
- C. All tests, reports, studies, surveys, demonstrations, or other evidence in their possession or control that contradict, qualify, or call into question the representation, or the basis relied upon for the representation, including complaints and other communications with consumers or with governmental or consumer protection organizations.

#### V.

IT IS FURTHER ORDERED that respondent Santa Fe Natural Tobacco Company, Inc., and its successors and assigns, shall deliver a copy of this order, in either paper or electronic form, to all current and future principals, officers, and directors, and to all current and future managers, employees, agents, and representatives having responsibilities with respect to the subject matter of this order. Respondent shall secure from each such person either 1) a signed and dated statement acknowledging receipt of the order; or 2) a dated, electronic acknowledgment indicating that the person has read, downloaded or printed the order. Respondent shall deliver this order to current personnel within thirty (30) days after the date of service of this order, and to future personnel within thirty (30) days after the person assumes such position or responsibilities. Respondent shall maintain and upon request make available to the Federal Trade Commission for inspection and copying a copy of each signed statement acknowledging receipt of the order or a record, in either electronic or paper form, of each electronic acknowledgment of receipt of the order.

#### VI.

IT IS FURTHER ORDERED that respondent Santa Fe Natural Tobacco Company, Inc., and its successors and assigns shall notify the Commission at least thirty (30) days prior to the sale of any of its tobacco products or herbal smoking products for which the composition or formula has been changed in such a manner as may affect compliance obligations arising under this order, including but not limited to the addition of any additives to any variety of such products. All notices required by this Part shall be sent by certified mail to the Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580.

**VII.**

IT IS FURTHER ORDERED that respondent Santa Fe Natural Tobacco Company, Inc., and its successors and assigns shall notify the Commission at least thirty (30) days prior to any change in the corporation that may affect compliance obligations arising under this order, including but not limited to a dissolution of a subsidiary, parent or affiliate that engages in any acts or practices subject to this order; the proposed filing of a bankruptcy petition; or a change in the corporate name or address. *Provided, however,* that, with respect to any proposed change in the corporation about which respondent learns less than thirty (30) days prior to the date such action is to take place, respondent shall notify the Commission as soon as is practicable after obtaining such knowledge. All notices required by this Part shall be sent by certified mail to the Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580.

**VIII.**

IT IS FURTHER ORDERED that respondent Santa Fe Natural Tobacco Company, Inc., and its successors and assigns shall, within sixty (60) days after the date of service of this order, and at such other times as the Federal Trade Commission may require, file with the Commission a report, in writing, setting forth in detail the manner and form in which they have complied with this order.

**IX.**

This order will terminate on June 12, 2020, or twenty (20) years from the most recent date that the United States or the Federal Trade Commission files a complaint (with or without an accompanying consent decree) in federal court alleging any violation of the order, whichever comes later; *provided, however,* that the filing of such a complaint will not effect the duration of:

- A. Any Part in this order that terminates in less than twenty (20) years;
- B. This order's application to any respondent that is not named as a defendant in such complaint; and
- C. This order if such complaint is filed after the order has terminated pursuant to this Part.

*Provided further,* that if such complaint is dismissed or a federal court rules that the respondent did not violate any provision of the order, and the dismissal or ruling is either not appealed or upheld on appeal, then the order will terminate according to this Part as though the complaint had never been filed, except that the order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

By the Commission.

Donald S. Clark  
Secretary

ISSUED: June 12, 2000

SEAL:

**ATTACHMENT A**

[To be printed on Santa Fe Natural Tobacco Company, Inc. letterhead]

[date]

Dear [retailer, distributor, or other purchaser for resale]:

This letter is to inform you that Santa Fe Natural Tobacco Company, Inc. recently reached a settlement agreement with the Federal Trade Commission ("FTC") concerning certain past advertising for Natural American Spirit cigarettes. The FTC has been reviewing "no additive" claims for cigarettes and other tobacco products as a result of concerns that such representations might mislead consumers to believe that tobacco products without additives are safer than tobacco products containing additives. As part of this review, the FTC conducted an investigation of past advertising for Natural American Spirit cigarettes and alleged that certain of our past advertising was misleading. Although we do not admit the FTC's allegations, we have agreed to notify our distributors, retailers and others who sell our cigarettes to consumers that we will be adding a new disclosure statement to certain advertisements making a "no additive" claim and that they should discontinue the use of certain old advertising materials not containing the new disclosure language.

**The FTC Agreement**

The FTC claimed that because we state that the tobacco used in Natural American Spirit cigarettes contains no additives or chemicals, we made implied, unsubstantiated claims that smoking our cigarettes is less hazardous to a smoker's health than smoking otherwise comparable cigarettes that contain additives or chemicals. Beginning in late 1997, we voluntarily began placing the statement "To our knowledge there is no research indicating cigarettes containing additive-free tobacco are safer than cigarettes with tobacco containing additives" in certain ads for Natural American Spirit tobacco cigarettes. Since early 1998, we have also included the statement "We make no representation expressed or implied that these cigarettes are any less hazardous than any other cigarettes" on the packaging of Natural American Spirit cigarettes. We have now agreed to revise our disclosure in certain advertisements for Natural American Spirit tobacco cigarettes to state the following:

**No additives in our tobacco does NOT mean a safer cigarette.**

**Our Notification Obligations**

In addition to agreeing to revise our disclosure statement, we have also agreed to request that you discontinue using, relying on or distributing certain old Natural American Spirit advertisements or promotional materials in your possession that do not contain the new disclosure statement. Certain existing point of sale items may continue to be used without the new disclosure statement while other items will need to be discontinued or removed unless a sticker is applied containing the new disclosure statement. In the near future, we will provide instructions for dealing with these existing items and we will be sending you new Natural American Spirit promotional materials. If you are a distributor, we also ask that you make this information available to your Natural American Spirit dealers who may have existing materials so that they can take similar action. The FTC agreement requires

us to cease doing business with even our most loyal customers in the event they continue using noncompliant materials, so please help us make this transition in an orderly and prompt fashion.

If you have any questions, you may call us at (xxx) xxx-xxxx. We apologize for any inconvenience this may cause you and thank you for your assistance.

Sincerely,

Robin Sommers, President  
Santa Fe Natural Tobacco Company, Inc.

## Exhibit 4



## FEDERAL TRADE COMMISSION PROTECTING AMERICA'S CONSUMERS



# FTC Accepts Settlements of Charges that "Alternative" Cigarette Ads Are Deceptive

## Settlements Require Companies to Disclose that Herbal Cigarettes Are Dangerous and that "No Additives" Does Not Mean a Safer Smoke

FOR RELEASE

April 27, 2000

Santa Fe Natural Tobacco Company, Inc., based in Santa Fe, New Mexico, and Alternative Cigarettes, Inc., based in Buffalo, New York, have agreed to settle Federal Trade Commission charges that ads for their cigarettes are deceptive. Santa Fe markets "Natural American Spirit" tobacco cigarettes, and also sold tobacco-free herbal cigarettes. Alternative Cigarettes markets "Pure" and "Gold" tobacco cigarettes, as well as "Herbal Gold" and "Magic" herbal cigarettes. The FTC alleged that the two companies implied in their advertisements, without a reasonable basis, that their tobacco-containing cigarettes are safer to smoke than other cigarettes because they contain no additives. The Commission also alleged that Alternative Cigarettes falsely implied that smoking its herbal cigarettes did not pose the health risks associated with smoking tobacco cigarettes. Under separate settlements, which the FTC has accepted for public comment, the companies have agreed to disclose prominently in future ads that make a "no additives" claim: "No additives in our tobacco does NOT mean a safer cigarette." Both companies have also agreed to disclose prominently on packages and in ads for herbal cigarettes that: "Herbal cigarettes are dangerous to your health. They produce tar and carbon monoxide."

According to Jodie Bernstein, Director of the FTC's Bureau of Consumer Protection, "These cigarettes are marketed with a 'natural' aura, but they're neither healthy nor safe. The new disclosures should make it clear that herbal cigarettes and cigarettes without additives are not safe to smoke. The fact is, there's no such thing as a safe smoke."

According to the FTC's complaints, Santa Fe and Alternative Cigarettes represented that because their tobacco cigarettes contain no additives, they are less hazardous than otherwise comparable cigarettes that contain additives. They did this through a variety of statements, including Alternative Cigarettes' assertion that "Native Americans smoked all-natural tobacco without the ills that are associated with smoking today." The complaints allege that the two companies did not have a reasonable basis for the representations at the time they were made. Among other reasons, the FTC alleged, the smoke from the Pure, Gold and Natural American Spirit cigarettes, like the smoke from all cigarettes, contains numerous carcinogens and toxins, including tar and carbon monoxide.

The complaint against Alternative Cigarettes also charged that the company falsely represented that smoking its Herbal Gold and Magic herbal cigarettes does not pose the health risks associated with smoking tobacco cigarettes. According to the complaint, Herbal Gold and Magic cigarette smoke, like smoke from tobacco cigarettes, contains numerous carcinogens and toxins, including tar and carbon monoxide. Herbal cigarettes, because they do not contain tobacco, are not statutorily required to bear a Surgeon General's warning and, in all but a few states, are not subject to laws that bar tobacco sales to minors.

The proposed consent orders address the deceptive "no additive" claim by requiring that both companies include a clear and prominent disclosure that: "No additives in our tobacco does NOT mean a safer cigarette" in advertisements that make a "no additives" claim. The disclosure is not required if the companies have scientific evidence demonstrating that their "no additives" cigarettes pose materially lower health risks than other cigarettes.

In addition, the proposed settlements would require both companies, on packaging and in advertisements that represent that an herbal smoking product has no tobacco, to include a clear and prominent disclosure that: "Herbal cigarettes are dangerous to your health. They produce tar and carbon monoxide." The disclosure is not required if the companies have scientific evidence demonstrating that their herbal smoking products do not pose any health risks.

The Alternative Cigarettes order also prohibits it from claiming that any herbal smoking product does not present the health risks associated with smoking tobacco cigarettes, or from making any other claim about the health risks associated with the use of any herbal smoking product unless the claims are true and the company has scientific evidence demonstrating its claims.

The proposed settlements would also require Santa Fe and Alternative Cigarettes to notify distributors and retailers that they should stop using existing ads and promotional materials that make the challenged claims and would require the companies to stop doing business with them if they do not do so.

The Commission vote to accept the two separate proposed consent agreements for public comment was 5-0. Announcements regarding the proposed consent agreements will be published in the Federal Register shortly. The agreements will be subject to public comment for 30 days, (until May 30, 2000) after which the Commission will decide whether to make them final. Comments should be addressed to the FTC, Office of the Secretary, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580.

**NOTE:** A consent agreement is for settlement purposes only and does not constitute an admission of a law violation. When the Commission issues a consent order on a final basis, it carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of \$11,000.

Copies of the complaints, proposed consent agreements and analyses of the proposed order to aid public comment in the Santa Fe Natural Tobacco Company and the Alternative Cigarettes matters are available from the FTC's web site at <http://www.ftc.gov> and also from the FTC's Consumer Response Center, Room 130, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580; 877-FTC-HELP (877-382-4357); TDD for the hearing impaired 1-866-653-4261. To find out the latest news as it is announced, call the FTC NewsPhone recording at 202-326-2710.

(FTC File No.: 992-3026 -- Santa Fe Natural Tobacco Company, Inc.)

(FTC File No.: 992-3022 -- Alternative Cigarettes, Inc.)

## Contact Information

**Media Contact:**

Brenda Mack

*Office of Public Affairs*

202-326-2182

**Staff Contact:**

Michael Ostheimer

Bureau of Consumer Protection

202-326-2699

(Santa Fe Natural Tobacco Company, Inc.)

Matthew Gold

Western Region - San Francisco

415-356-5276

(Alternative Cigarettes, Inc.)



[ftc.gov](http://ftc.gov)

# Exhibit 5



## FEDERAL TRADE COMMISSION PROTECTING AMERICA'S CONSUMERS



# FTC Accepts Settlement of Charges That Ads For Winston "No Additive" Cigarettes Are Deceptive

## Settlement Requires R.J. Reynolds to Disclose in Future Ads that "No Additives" Does Not Mean a Safer Smoke

FOR RELEASE

March 3, 1999

R.J. Reynolds Tobacco Co. has agreed to settle Federal Trade Commission charges that its ads for Winston "no additives" cigarettes are deceptive. The agency alleged that Reynolds implied in its advertisements, without a reasonable basis, that Winston cigarettes are safer to smoke because they contain no additives. Under the settlement, which the FTC has accepted for public comment, Reynolds has agreed to make the following prominent disclosure in future Winston ads: **"No additives in our tobacco does NOT mean a safer cigarette."**

According to the FTC's Director of Consumer Protection Jodie Bernstein, "Reynolds' disclosure should clear up any misconception that cigarettes without additives are safer to smoke than other cigarettes. Frankly, there's no such thing as a 'Safe Smoke.'"

The use of ingredients other than tobacco in the manufacture of cigarettes has been a matter of some concern for a number of years, the FTC said. While some additives are used to affect the taste of the cigarette, others are thought to affect the physical properties of the cigarette, such as its burn rate.

According to the FTC's complaint outlining the charges, Reynolds represented that because they contain no additives, Winston cigarettes are less hazardous than otherwise comparable cigarettes that contain additives. The complaint alleges that Reynolds did not have a reasonable basis for the representations at the time they were made. Among other reasons, the agency alleged, the smoke from Winston cigarettes, like the smoke from all cigarettes, contains numerous carcinogens and toxins.

The proposed settlement would require Reynolds to include a disclosure in most advertising for Winston or any other tobacco products Reynolds advertises as having no additives. According to the proposed order, the disclosure must be included in all advertising for Winston no-additive cigarettes, regardless of whether that advertising contains a "no additives" claim, for a period of one year beginning no later than July 15, 1999. Thereafter, the disclosure must be included in all Winston advertising that represents (through such phrases as "no additives" or "100% tobacco") that the product has no additives. The disclosure is not required if Reynolds has scientific evidence demonstrating that its "no additives" cigarette poses materially lower health risks than other cigarettes.

The proposed settlement requires that the disclosure must be placed in a rectangular box 40 percent of the size of the Surgeon General's warning, in a clear and prominent location. Reynolds also would have to instruct each of its sales representatives to remove or sticker, with the applicable disclosure, any advertisement displayed in a retail establishment representing that Winston cigarettes have no additives.

In 1984, Congress amended the Federal Cigarette Labeling and Advertising Act to require cigarette manufacturers to submit to the Secretary of Health and Human Services a list of all ingredients added to the cigarettes they manufacture. The Secretary is required to keep this information confidential, but to report to Congress information about any ingredient that the Secretary believes to pose a health risk to smokers.

***The Commission vote to accept the proposed consent agreement for public comment was 4-0*** with Commissioner Orson Swindle issuing the following concurring statement: "I have voted to accept this consent agreement for public comment because the remedies, including a corrective statement in Winston advertisements for one year, are warranted by the facts of this case. The nationwide advertising campaign for "no additives" Winston cigarettes, launched in August 1997, is unusually extensive. Based on my reading of the record, I am convinced that many consumers interpret ads containing express "no additives" claims to mean that Winston's are not as harmful as other cigarettes, and such a health claim is presumably important to consumers in their purchasing decisions. Based on the extent and magnitude of the ongoing ad campaign and the demonstrated strength of the implied health claim, I am willing to infer that the claim will linger in the minds of consumers for one year absent a corrective statement. I am particularly concerned about a lingering effect of the ads because of the well-recognized health risks of smoking. Under these circumstances, I support the corrective advertising remedy contained in the proposed consent order."

The proposed consent agreement will be published in the Federal Register shortly. The agreement will be subject to public comment for 60 days, after which the Commission will decide whether to make it final. Comments should be addressed to the FTC, Office of the Secretary, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580.

**NOTE:** A consent agreement is for settlement purposes only and does not constitute an admission of a law violation. When the Commission issues a consent order on a final basis, it carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of \$11,000.

**Copies** of the complaint, proposed consent order, and an analysis of the proposed consent order to aid public comment are available from the FTC's web site at: <http://www.ftc.gov> and also from the FTC's Consumer Response Center, Room 130, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580; 202-FTC-HELP (202-382-4357); TDD for the hearing impaired 1-866-653-4261. Consent agreements subject to public comment also are available by calling 202-326-3627. To find out the latest news as it is announced, call the FTC NewsPhone recording at 202-326-2710.

(FTC File No. 9923025)

## Contact Information

### Media Contact:

Victoria Streitfeld,  
*Office of Public Affairs*  
202-326-2718

### Staff Contact:

Beth Grossman,

Bureau of Consumer Protection  
202-326-3019



ftc.gov

# Exhibit 6

## ASSURANCE OF VOLUNTARY COMPLIANCE

This Agreement is entered into effective March 1, 2010 by Santa Fe Natural Tobacco Company, Inc. (SFNTC) and the Signatory States through their respective Attorneys General.

WHEREAS, SFNTC advertises some of its Natural American Spirit brand cigarettes and roll your own (RYO) tobacco as containing "organic" and/or "100% organic" tobacco; and

WHEREAS, the Attorneys General allege that consumers may be misled by this advertising and believe that "organic" or "100% organic" is safer or less harmful than other tobacco; and

WHEREAS, SFNTC does not have competent, reliable, scientific evidence that organic tobacco is safer or less harmful than other tobacco; and

WHEREAS, the Attorneys General believe that the advertisements are deceptive and misleading in violation of the Master Settlement Agreement and Consent Decree as well as various state consumer protection laws; and

WHEREAS, SFNTC believes that the advertisements are true and not misleading because SFNTC uses exclusively tobacco that is certified under the National Organic Program of the United States Department of Agriculture to manufacture its Natural American Spirit brand cigarettes made with organic tobacco and organic roll your own tobacco, and thus are not deceptive; and

WHEREAS, the parties have determined that it is the interest of all parties to enter into this Agreement rather than proceed to litigation; and

WHEREAS, the parties wish to completely settle, release and discharge all claims under the MSA and the Consent Decree, as well as state consumer protection statutes that relate to the legality of advertising cigarettes or RYO tobacco as containing “organic” or “100% organic” tobacco; and

WHEREAS, this Agreement constitutes a good faith settlement of the dispute and disagreement between the parties relating to the advertising of “organic tobacco”;

NOW, THEREFORE, in consideration of their mutual agreement to the terms of this Agreement, and other such consideration described herein, the sufficiency of which is hereby acknowledged, the parties, acting by and through their attorneys, stipulate and agree as follows:

#### A. DEFINITIONS

For purposes of this Agreement, the following definitions shall apply:

1. “Advertisement” shall mean any written or oral statement, illustration, or depiction that is designed to effect a sale or create interest in the purchasing of any product, including but not limited to a statement, illustration or depiction in or on a brochure, newspaper, magazine, freestanding insert, pamphlet, leaflet, circular, mailer, book insert, letter, coupon, catalog, poster, chart, billboard, transit advertisement, point of purchase display, specialty or utilitarian item, sponsorship material, package insert, film, slide, or on the Internet or other computer network or system.

2. “Tobacco product” shall mean cigarettes, cigars, cigarillos, little cigars, smokeless tobacco, cigarette tobacco, roll your own tobacco, pipe tobacco, and any other product made or

derived from tobacco that is intended for human consumption, including any component, part, or accessory of a tobacco product.

3. "Clearly and prominently" shall mean:

a. In black type on a solid white background, or in white type on a solid red background, or in any other color combination that would provide an equivalent or greater degree of print contrast that is objectively determined by densitometer or comparable measurements of the type and the background color. The color of the ruled rectangle shall be the same color as that of the type; and

b. Centered, both horizontally and vertically in a ruled rectangle. The area enclosed by the rectangle shall be no less than 40% of the size of the area enclosed by the ruled rectangle surrounding the health warnings for tobacco cigarettes mandated by 15 U.S.C. §1333. The width of the rule forming the rectangle shall be no less than 50% of the width of the rule required for the health warnings for tobacco cigarettes mandated by 15 U.S.C. §1333; and

c. In the same type style and type size as that required for health warnings for tobacco cigarettes pursuant to 15 U.S.C. §1333; and

d. In a clear and prominent location, but not immediately next to other written or textual matter for any rectangular designs, elements, or similar geometric forms, including but not limited to any warning statement required under the Federal Cigarette Labeling and Advertising Act, 15 U.S.C. §1331 *et seq.*, or the Comprehensive Smokeless Tobacco Health Education Act, 15 U.S.C. § 4401 *et seq.* In addition, the disclosure shall not be positioned in the margin of a print advertisement. A disclosure shall be deemed "not immediately next to" other

geometric or textual matter if the distance between the disclosure and the other matter is as great as the distance between the outside left edge of the rule of the rectangle enclosing a health warning required by 15 U.S.C. §1333 and a top left point of the letter "S" in the word "SURGEON" in that health warning; and

e. For a multi-paged Advertisement or an Advertisement that contains both a front and back side, either on the first or front page of the Advertisement, or on the same page or side of the Advertisement that displays the health warning required by 15 U.S.C. §1333; and

f. For audiovisual or audio Advertisements, including but not limited to Advertisements on videotapes, cassettes, discs or the Internet; professional films or film strips; and professional audio tapes or other types of sound recordings, the disclosure shall appear on the screen at the end of the Advertisement in the format described above for a length of time and in such a manner that is easily legible and shall be announced simultaneously at the end of the Advertisement in a manner that is clearly audible.

PROVIDED however, that in any Advertisement that does not contain a visual component, the disclosure need not appear in visual form and, and in any Advertisement that does not contain an audio component, the disclosure need not be announced in audio format.

PROVIDED also, however, that these provisions apply consistent with the new amendments and modifications to 15 U.S. C. §1333, enacted in the Family Smoking Prevention and Tobacco Control Act, and shall continue to apply in the future if 15 U.S.C. §1333 is amended, modified or superseded by any other law. Notwithstanding anything else in this Agreement, any disclosure required by this Agreement shall be considered to have been made

"clearly and prominently" if it conforms to the requirements as to size, appearance and placement of disclosures in advertisements for tobacco cigarettes set out in the Decision and Order of the Federal Trade Commission issued June 12, 2000, in *In re Santa Fe Natural Tobacco Company, Inc.*, FTC Docket No. C-3952, as such requirements may be amended in the future in connection with the Family Smoking Prevention and Tobacco Control Act or otherwise.

4. "Effective Date" shall mean March 1, 2010.

5. "Signatory States" shall mean all of those states that have signed this Agreement by an authorized representative of the state's Attorney General by no later than the Effective Date.

## B. TERMS

1. Beginning no later than thirty (30) days after the Effective Date of this Agreement, SFNTC will cause any and all Advertisements thereafter placed for display or distribution in any Settling State to conform to the requirements of this Agreement. "Placed for display or distribution," as used in the previous sentence, occurs (a) for electronic Advertisements on any date that such Advertisements are displayed to the public, and (b) for all other Advertisements, on the date that mechanical artwork for the Advertisement is sent by SFNTC or its agent to the printer.

2. In addition to any other statements, disclaimers, warnings required by law, SFNTC shall directly or through any corporation, subsidiary, division or other device and, in connection with the advertising, promotion, offering for sale, sale, or distribution of Natural American Spirit tobacco products, display in Advertisements as specified below, Clearly and Prominently, the following disclosures (including the line breaks, punctuation, bold font and capitalization

illustrated, but not including quote marks). In Advertisements for cigarettes made with organic tobacco:

“Organic tobacco does NOT mean a safer cigarette”

In Advertisements for organic roll your own or pouch tobacco:

“Organic tobacco does NOT mean safer tobacco”

These disclosures shall be displayed in any Advertisement that, through the use of such terms or phrases as “organic” or “100% organic” or “organic tobacco” or “100% organic tobacco” or other phrase containing the term “organic” represents that any SFNTC product is organic or contains organic tobacco.

3. The above disclosures shall not be required in any cigarette advertisement that is not required to bear a health warning pursuant to 15 U.S.C. §1333.

4. Nothing contrary to, inconsistent with, or in mitigation of any disclosure provided for in this part shall be used in any Advertisement. This provision shall not prohibit SFNTC from truthfully representing through the use of such phrases as “organic” or “100% organic” or other phrase containing the term “organic” that a tobacco product is organic or contains organic tobacco, where such representation is truthful, and is accompanied by the disclosure mandated by this Agreement.

5. No more than forty five (45) days after the Effective Date of this Agreement, SFNTC shall provide a copy of the notice attached hereto as Exhibit A by first-class mail, or other faster delivery method, to each retailer, distributor or other purchaser for resale to whom SFNTC has

supplied organic Natural American Spirit Cigarettes or organic roll your own tobacco since July 1, 2007.

6. SFNTC shall discontinue dealing with any retailer, distributor, or other purchaser for resale once SFNTC has actual knowledge, or knowledge fairly implied on the basis of objective circumstances, that such retailer, distributor, or other purchaser for resale has continued to use or disseminate any of SFNTC's Advertisements for any tobacco products that have been discontinued per this Agreement, unless, upon notification by SFNTC, such retailer, distributor, or other purchaser for resale immediately ceases using or disseminating such Advertisements. If, after such notification, SFNTC obtains actual knowledge, or knowledge fairly implied on the basis of objective circumstances, that such retailer, distributor, or other purchaser for resale has not permanently ceased using or disseminating such Advertisements, SFNTC must immediately and indefinitely discontinue dealing with such retailer, distributor, or other purchaser for resale, until such time as SFNTC has obtained written assurance and verified that such retailer, distributor, or other purchaser for resale has permanently ceased using or disseminating such Advertisements.

7. SFNTC shall maintain for a period of five years from the Effective Date, and upon request make available to the Signatory States, copies of all notification letters sent to retailers, distributors, or other purchasers for resale pursuant to this Agreement, as well as copies of all communications with retailers, distributors, or other purchasers for resale pursuant to paragraph 6 above.

8. SFNTC shall maintain for a period of five years from the Effective Date, and upon request make copies available to the Signatory States, for all representations covered by this Agreement:

- a. All Advertisements and packaging containing the representation;
- b. All materials that were relied upon in disseminating the representation; and
- c. All tests, reports, studies, surveys, demonstrations, or other evidence that contradict, qualify, or call into question the representation, or the basis relied upon for the representation, including complaints and other communications with consumers or with governmental or consumer protection organizations.

9. Within 60 days after the Effective Date of this Agreement, SFNTC shall prepare and submit a report to the Signatory States which details compliance with this Agreement and includes copies of relevant advertisements and notices.

10. It is acknowledged that SFNTC enters into this Agreement for settlement purposes only. This Agreement does not constitute an admission by SFNTC that the law has been violated as alleged by the Signatory States, or that the facts alleged by the Signatory States, other than jurisdictional facts, are true.

EXHIBIT A

Dear [retailer, distributor, or other purchaser for resale]

This letter is to inform you that Santa Fe Natural Tobacco Co. Inc. (SFNTC) recently reached a settlement agreement with various state Attorneys General concerning advertising for Natural American Spirit cigarettes made with organic tobacco and organic roll your own tobacco (RYO). The States were concerned that the advertising for our products containing organic tobacco might lead consumers to believe that these products are safer than products without organic tobacco. While we believe our advertising is and has been truthful and not misleading, we have agreed to make certain changes to our advertising.

As per the Agreement with the States, we will add disclaimers to cigarette advertising containing the organic or 100% organic claims, indicating:

“Organic tobacco does NOT mean a safer cigarette”;

and we will add disclaimers to roll your own tobacco advertising containing the organic or 100% organic claims, indicating:

“Organic tobacco does NOT mean safer tobacco.”

If you carry Natural American Spirit products made with organic tobacco, in the near future you will be receiving new advertising and promotional materials for those products that display the above disclaimers. When you receive these new materials, please discard the earlier materials that they replace and begin using the new materials exclusively.

If you have any questions, please call us at (866) 232-5660 (Distributors) or (800) 982-7454 (Retailers). We apologize for any inconvenience this may cause you and thank you for your assistance and cooperation.

Sincerely yours,

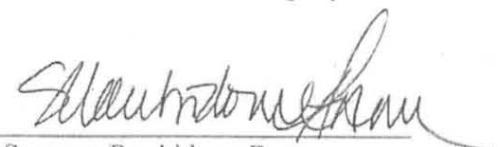
President  
Santa Fe Natural Tobacco Company Inc.

Dated: February 2, 2010

Santa Fe Natural Tobacco Company, Inc.

By:

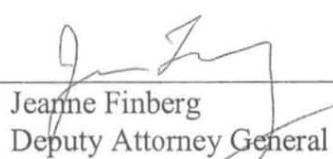
Name: Susanne Roubidoux Farr  
Title: General Counsel



STATE OF CALIFORNIA

ATTORNEY GENERAL EDMUND G. BROWN JR.

By:



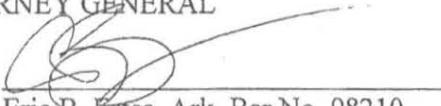
Jeanne Finberg  
Deputy Attorney General

Date: February 23, 2010

STATE OF Arizona  
Attorney General Terry Goddard  
By: Nicole D. Pepe  
Date: February 12, 2010

OFFICE OF THE ARKANSAS ATTORNEY GENERAL

Dustin McDaniel  
ATTORNEY GENERAL

By:   
Eric B. Estes, Ark. Bar No. 98210  
Senior Assistant Attorney General  
323 Center Street, Suite 200  
Little Rock, Arkansas 72201  
Telephone: (501) 682-8090  
Email: Eric.Estes@ArkansasAG.gov

STATE OF Colorado  
Attorney General John W. Suthers  
By: Brian L. Taylor  
Date: February 23, 2010

STATE OF CONNECTICUT

Richard Blumenthal  
Attorney General

By: Heather J. Wilson  
Heather J. Wilson  
Assistant Attorney General

Date: February 26, 2010

STATE OF DELAWARE

Attorney General Joseph R. Biden, III

By: Thomas E. Brown, Deputy Attorney General

Tom E. Brown  
Date: February 22, 2010

DISTRICT OF COLUMBIA  
Attorney General Peter J. Nickles

By: Bennett Rushkoff  
Bennett Rushkoff  
Chief, Public Advocacy Section  
Office of the Attorney General  
for the District of Columbia

Date: February 23, 2010

STATE OF Georgia

Attorney General Thurbert E. Baker

By: Rosemary Lohmeyer, Assistant Attorney General

Date: 2/19, 2010

STATE OF Hawaii

Attorney General Mark J. Bennett

By: [Signature]

Date: Jan. 18, 2010

STATE OF Idaho

Attorney General Lawrence Wasden

By: Ruth D. Lujan

Date: 2/18, 2010

STATE OF Illinois

Attorney General Lisa Madigan

By: Katherine Johnson, AAG

Date: Feb. 22, 2010

STATE OF Iowa

Attorney General of Iowa

By: Matthew R. Gannon  
Matthew L. Gannon, Assistant Attorney General

Date: February 23, 2010

STATE OF KANSAS

Attorney General STEVE SIS

By: Zenide Fack

Date: February 18, 2010

STATE OF Kentucky

Attorney General Jack Conway

By: Michael Plumley, Asst. Atty. Gen.

Date: February 22, 2010

THE STATE OF LOUISIANA

JAMES D. "BUDDY" CALDWELL  
ATTORNEY GENERAL

By: Sanetria Glasper Pleasant  
Sanetria Glasper Pleasant, La. Bar #25396  
Director, Public Protection Division  
Louisiana Department of Justice  
Office of the Attorney General  
1885 North Third Street  
P. O. Box 94005  
Baton Rouge, Louisiana 70804  
Telephone: (225) 326-6423  
Facsimile: (225) 326-6072

STATE OF Maine

Attorney General Janet T. Mills

By: Janet Mills

Date: February 22, 2010

In re Santa Fe Natural Tobacco Company  
Assurance of Voluntary Compliance

STATE OF MARYLAND  
Attorney General Douglas F. Gansler

By: Marlene Trestman

Marlene Trestman  
Special Assistant to the Attorney General  
200 St. Paul Place - 20<sup>th</sup> Floor  
Baltimore, MD 21202  
410.576.7219  
[mtrestman@oag.state.md.us](mailto:mtrestman@oag.state.md.us)

Date: February 23, 2010

ASSURANCE OF VOLUNTARY COMPLIANCE by  
SANTA FE NATURAL TOBACCO COMPANY, INC.

Commonwealth of Massachusetts  
Attorney General Martha Coakley  
By: Elizabeth J. Koenig, Assistant Attorney General

Elizabeth J. Koenig  
Date: February 18, 2010

STATE OF MONTANA

Attorney General Steve Bullock

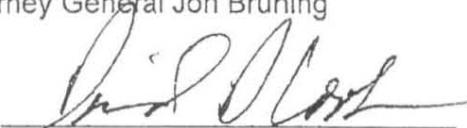
By: Chris Tweenen  
Chris Tweenen  
Chief Civil Council

February 22, 2010

STATE OF NEBRASKA

Attorney General Jon Bruning

By:



\_\_\_\_\_  
David D. Cookson, Chief Deputy

Date: February A, 2010

STATE OF NEVADA

CATHERINE CORTEZ MASTO  
Attorney General

By:



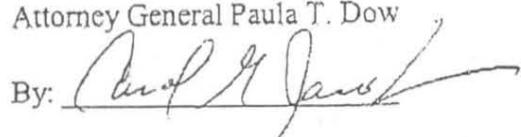
\_\_\_\_\_  
DARRELL FAIRCLOTH  
Senior Deputy Attorney General

Date: February 23, 2010

STATE OF NEW JERSEY

Attorney General Paula T. Dow

By:



Date: February 23, 2010

STATE OF New Mexico

Attorney General Gary King

By: David K. Thorne

Date: Feb 10, 2010

Dated: February 24, 2010

ANDREW M. CUOMO  
Attorney General of the State of New York  
By:



MARC A. KONOWITZ  
Assistant Attorney General

STATE OF North Carolina

Attorney General Roy Cooper

By: Melissa J. Sirie  
Special Deputy Attorney General  
Date: February 24, 2010

STATE OF OHIO  
Attorney General RICHARD CORDRAY  
By: CAROL V. MOSHOLD ER  
Date: Feb. 3, 2010

STATE OF Oregon  
Attorney General John Kroger  
By: Daly P. (Drew Karopoulis)  
Date: Feb. 8, 2010

In the Matter of Santa Fe Natural Tobacco Company, Inc.

THOMAS W. CORBETT, JR.  
Attorney General  
State of Pennsylvania

BY: Carly J. Wismer  
**CARLY J. WISMER**  
Deputy Attorney General  
Tobacco Enforcement Section  
Attorney I.D. #92598

Office of Attorney General  
15<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120  
Phone: (717) 783-1794  
Fax: (717) 705-0916

**JOEL M. RESSLER**  
Chief Deputy Attorney General  
Tobacco Enforcement Section  
Attorney I.D. #28625

DATED: February 19, 2010

STATE OF TENNESSEE  
Attorney General R. Cooper Jr.  
By: ROBERT E. COOPER, JR.  
Date: February 17, 2010

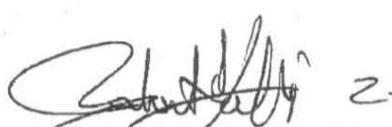
Assurance of Voluntary Compliance  
Santa Fe Natural Tobacco Company, Inc.

Dated this 5<sup>th</sup> day of February, 2010.

MARTY JACKLEY  
South Dakota Attorney General

By: Patricia Archer  
Patricia Archer  
Assistant Attorney General  
Office of the Attorney General  
1302 E. Highway 14, Suite 1  
Pierre, SD 57501  
Ph. (605) 773-3215  
Email: Pat.Archer@state.sd.us

STATE OF VERMONT  
Attorney General WILLIAM H. SORRELL  
By: William H. Sorrell  
Date: February 10<sup>th</sup>, 2010



2-8-10

Robert J. Fallis  
Assistant Attorney General  
State of Washington

STATE OF WEST VIRGINIA

Attorney General DARREL V. McGRAW  
By: John D. Fallis, SR. ASST. A.G.  
Date: 2/25, 2010

STATE OF WISCONSIN

ATTORNEY GENERAL J.B. VAN HOLLEN

By: Christopher J. Blythe  
Christopher J. Blythe, Asst. Atty. General

Date: February 9, 2010

re: ave w/Santa Fe Natural Tobacco Co.

# Exhibit 7



UNITED STATES OF AMERICA  
**FEDERAL TRADE COMMISSION**  
 WASHINGTON, D.C. 20580

Division of Advertising Practices

Lisa B. Kopchik  
 Attorney

Direct Dial  
 (202) 326-3139

September 22, 1997

**BY FAX: (505) 986-8445**

Robin Sommers, CEO  
 Santa Fe Natural Tobacco Company  
 1368 Cerrillos Road  
 Santa Fe, New Mexico 87505

Re: **Advertising for Natural American Spirit cigarettes**  
File number 972-3235

Dear Mr. Sommers:

Pursuant to Sections 6, 9, and 10 of the Federal Trade Commission Act (15 U.S.C. Sections 46, 49, and 50), Commission staff is conducting an inquiry into advertising for Natural American Spirit cigarettes ("the product"). The purpose of this inquiry is to determine whether you or others are engaged in unfair or deceptive practices in violation of Section 5 of the FTC Act (15 U.S.C. Section 45).

To further our review, we request your voluntary cooperation, and ask that you submit, at your earliest convenience, but no later than October 10, 1997, the following information:

1. A copy of every print and outdoor advertisement disseminated since January 1, 1997 for Natural American Spirit cigarettes containing a statement that the product is "100% free of chemical additives," "natural," or similar statement that the product contain no additives or fewer additives than other cigarettes.
2. The names and addresses of all individuals and companies, including but not limited to advertising agencies, marketing firms, public relations firms, or others who participated in the development, preparation, or placement of the advertisements and promotional materials requested in Paragraph 1, above. Briefly state the tasks performed by these individuals and companies, and the dates the tasks were performed.
3. Identify each style of Natural American Spirit cigarettes currently sold (including but not limited to all lengths, strengths, hard pack or soft pack, menthol or not), and for each give the most recent the tar and nicotine ratings.

SF003 5626

4. Whether each of the brand styles identified in response to paragraph 3, above, is made with reconstituted tobacco, and if so, state:

- a. how much reconstituted tobacco is used in each cigarette; and
- b. each and every ingredient used in creating that reconstituted tobacco.

5. All documents, prepared by Santa Fe Natural Tobacco Company, its agent, or on its behalf, relating or referring to data or analysis of consumer perception, comprehension or recall of any disseminated or undisseminated advertisement, package label, product insert, or promotional material for cigarettes containing a statement that the product is "100% free of chemical additives," "natural," or similar statement that the cigarettes contain no additives or fewer additives than other cigarettes. Such documents would include, but are not limited to, copy tests, marketing surveys and reports, penetration tests, recall tests, audience reaction tests, or communication tests.

6. All documents referring or relating to all marketing, media or copy strategies, prepared by or for Santa Fe Natural Tobacco Company, its agent, or on its behalf, relating or referring to the phrase "100% free of chemical additives," "natural," or any similar statement that any product contains no additives or fewer additives than similar products, and any documents referring or relating to any such marketing, media, or copy strategies referring or relating to additives or the lack thereof in any consumer product.

7. Please provide all substantiation, including but not limited to tests, experiments, demonstrations, reports, studies, research and oral opinions, on which you rely or have relied in making statements that the product is "100% free of chemical additives" and "natural."

8. All documents that tend to call into question or disprove the statements in Paragraph 7.

9. Whether or not you agree that you make the claims, provide all substantiation, including but not limited to tests, experiments, demonstrations, reports, studies, research and oral opinions, on which you rely or have relied in making statements that the filter and each of the papers used in all Natural American Spirit cigarettes are "100% free of chemical additives" and "natural," or similar statements that each and every component of the cigarettes contain no additives or fewer additives than other cigarettes.

10. All documents that tend to call into question, disprove, or contradict the statements in Paragraph 9.

11. Describe all processes and treatments applied or done to the tobacco, the filter and each of the papers, both before the cigarettes are assembled and after assembly.

12. State separately for the tobacco, each of the papers, and the filter the identity of the manufacturer; and give the name, serial number and other information sufficient to identify that manufacturer's product.

SF003 5627

With regard to the document requests, please provide copies within the control of Santa Fe Natural Tobacco Company and its agents, affiliates, and parent companies, including its advertising agency(s). Please submit complete copies of all documents and information requested. If any documents are undated, state the date on which they were prepared or received by Santa Fe Natural Tobacco Company. Please itemize your response according to the numbered paragraphs in this letter.

For purposes of this letter, the word "any" shall be construed to include the word "all" and the word "all" shall be construed to include the word "any." Additionally, the word "or" shall be construed to include the word "and," and the word "and" shall be construed to include the word "or."

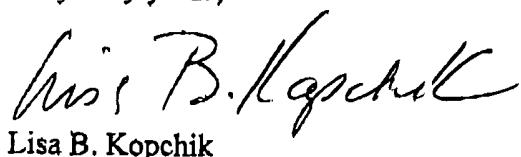
Under Section 21(f) of the Federal Trade Commission Act (15 U.S.C. Section 57b-2(f)), all documents and information provided voluntarily in lieu of compulsory process in law enforcement investigations will be exempt from public disclosure under the Freedom of Information Act (5 U.S.C. Section 552(b)(3)(B)). Furthermore, under Commission Rule 4.10(d), any material you provide which is marked "CONFIDENTIAL" will be given the same confidential treatment as material provided in response to compulsory process. The Commission's procedures concerning public disclosure and confidential treatment can be found at 15 U.S.C. Sections 46(f) and 57b-2, and Commission Rules 4.10-4.11 (16 C.F.R. Sections 4.10-4.11 (1984)).

If you decide to withhold all or any portion of any responsive material for any reason, including an applicable privilege (e.g., attorney-client privilege) or judicial order, please notify me on or before the date set for response to this request. If any such responsive material is withheld for any reason, please submit a list of the items withheld and state individually as to each item: the type, title, specific subject matter, and the date of the item; the names, addresses, positions and organizations of all authors and recipients of the item; and the specific reason(s) for withholding the item.

These requests are preliminary. We reserve the right to seek access to additional information and to pursue other avenues of inquiry as we may later deem appropriate.

Should you have any questions, please feel free to contact me. Thank you for your cooperation.

Very truly yours,



Lisa B. Kopchik

11. Describe all processes and treatments applied or done to the tobacco, the filter and each of the papers, both before the cigarettes are assembled and after assembly.

*Response*

**TOBACCO**

Various grades of tobacco are purchased from leaf dealers, primarily Universal Leaf Tobacco Company. At the time the tobacco is purchased it is in a redried state. This means the tobacco has been processed in a tobacco stemming plant. The stemmery plant is where tobacco goes after being purchased from growers at tobacco auction warehouses. The process at the stemmery involves conditioning tobacco with steam and water and then running the tobacco through a series of machines in order to separate the main stem from the leaf portion. The leaf portion is then chopped to the desirable size (1"-2" in diameter) and conveyed through a drying machine which dries the natural moisture out of the tobacco. Before exiting the drying machine, moisture is put back into the tobacco at a level that will not cause the tobacco to rot. During the stemming process only steam and water are applied to the tobacco. The tobacco is then stored and allowed to age for twelve to eighteen months.

SFNTC purchases the tobacco after proper aging to use in its blend. SFNTC then sends the tobacco to another facility which is a primary processing operation. SFNTC currently has this process done by an outside contractor, Standard Commercial Tobacco Company. In the primary process, the various grades of tobacco are again conditioned with steam and water and then blended together in large blending silos. The tobacco is then conveyed through tobacco cutters, which shred the tobacco to the size required for making cigarettes. The shredded tobacco is then conveyed into a dryer where the tobacco is dried down to the moisture required for making cigarettes. After drying, the tobacco is packed in corrugated containers for shipment to SFNTC's manufacturing plant. During the primary process, only steam and water are applied to the tobacco. Any time Standard Commercial is processing tobacco for SFNTC, an SFNTC representative is present at the Standard facility to monitor the quality control aspects to ensure they meet our requirements.

Once the tobacco is received at the SFNTC manufacturing facility, it is stored until needed. When needed, the tobacco is carried into the manufacturing department, the corrugated container is opened, and the tobacco is manually fed into the hopper section of the cigarette making machine.

**FILTERS**

SFNTC buys filter rods from an established cigarette filter manufacturer. The filter rods are 120mm long and are received packaged in a corrugated container known as a filter tray. Each tray contains 4,260 rods.

The trays are palletized by the filter manufacturer with thirty-two trays per pallet. Once the trays are received at SFNTC's manufacturing facility, they are stored in a climatically controlled room until needed for production. When the filter rods are to be used, they are taken to the manufacturing department where the rods are transferred from their corrugated container into a plastic filter rod tray. The tray can then be placed on the tipping unit, and the rods gravity-fall into the hopper on the tipping unit. The tipping unit is connected to the cigarette maker. The

120mm filter rods are cut six times in the tipping unit yielding six 20mm filters. The 20mm filters are then connected to the tobacco rod and wrapped with tipping paper to complete the cigarette which measures 84mm in over all length.

### **CIGARETTE PAPER**

Cigarette paper is purchased from a specialist paper manufacturer and is received as bobbins of paper which are 27mm wide with 5000 meters of paper on each bobbin. The bobbins are received on pallets with 216 bobbins per pallet. Upon receiving the paper at SFNTC's manufacturing facility, the paper is stored in a climatically controlled room until needed for production. Once required for production, the bobbins are moved to the manufacturing department, and a bobbin of paper is mounted on the cigarette making machine.

The paper is threaded through a series of rollers on the making machine up to the belt that brings the tobacco from the maker hopper. The tobacco conveys onto the cigarette paper and the paper folds around the tobacco to form the cigarette rod. The rod is then cut into lengths of 64mm and then goes to the tipping unit for filter attachment.

### **TIPPING PAPER**

Tipping paper is ordered from the specialist supplier and is received on bobbins. Each bobbin has tipping paper that is 50mm wide and 3,500 meters in length. The paper is palletized when received with 100 bobbins on each pallet. The tipping paper is stored in a climatically controlled room until needed for production. Once required for production, the tipping paper is moved to the manufacturing department, and one bobbin of tipping paper is mounted on the tipping unit. The tipping unit then cuts the paper and applies it around the cigarette rod and filter in order to connect the two.

QUESTION #12

SF003 5599

12. State separately for the tobacco, each of the papers, and the filter the identity of the manufacturer; and give the name, serial number and other information sufficient to identify that manufacturer's product.

*Response*

Tobacco purchased from:	Universal Leaf P.O. Box 25099 Richmond, VA 23260	Atlantic Orient Tobacco Company 3600 West Broad Street Richmond, VA 23230
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Natural American Spirit (Full strength)

Component	Mfg.	Serial #
Cigarette Paper	Schweitzer-Mauduit	508
Tipping	Tannpapers	020
Filters	Baumgartner	6030

Natural American Spirit (Medium Strength)

Component	Mfg.	Serial #
Cigarette Paper	Schoeller-Hoesch	Pela 170 MNC TCF
Tipping	Tannpapers	040
Filters	Baumgartner	6524

Natural American Spirit (Menthol)

Component	Mfg.	Serial #
Cigarette Paper	Schweitzer-Mauduit	508
Tipping	Tannpapers	020
Filters	Baumgartner	6610

Natural American Spirit (Non-Filter)

Component	Mfg.	Serial #
Cigarette Paper	Schweitzer-Mauduit	508

# Exhibit 8

# Santa Fe Natural Tobacco Company, Inc. 8/27/15



Department of Health and Human Services

Food and Drug Administration  
Center for Tobacco Products  
10903 New Hampshire Avenue  
Silver Spring, MD 20993

AUG 27, 2015

**VIA UPS and FAX**

Michael Little, President  
Santa Fe Natural Tobacco Company, Inc.  
1 Plaza La Prensa  
Santa Fe, NM 87507

**WARNING LETTER**

Dear Mr. Little:

The Center for Tobacco Products of the U.S. Food and Drug Administration (FDA) reviewed your cigarette product labeling and determined that your cigarette products are manufactured and distributed or offered for sale to customers in the United States. Under section 201(rr) of the Federal Food, Drug, and Cosmetic Act (the FD&C Act) (21 U.S.C. § 321(rr)), as amended by the Family Smoking Prevention and Tobacco Control Act (Tobacco Control Act), these products are tobacco products because they are made or derived from tobacco and intended for human consumption. Certain tobacco products, including cigarettes, are subject to FDA jurisdiction under section 901(b) of the FD&C Act (21 U.S.C. §

387a(b)).

FDA has determined that several of your cigarette products are adulterated under section 902(8) of the FD&C Act (21 U.S.C. § 387b(8)) because they are modified risk tobacco products sold or distributed without an FDA order in effect that permits such sale or distribution.

### **Modified Risk Tobacco Product Violations**

You sell or distribute cigarette products the label, labeling, or advertising of which represents explicitly and/or implicitly that the products or their smoke do not contain or are free of a substance and/or that the products present a lower risk of tobacco-related disease or are less harmful than one or more other commercially marketed tobacco products. Specifically, you sell or distribute Natural American Spirit cigarettes described in product labeling as "Natural" and "Additive Free."

A tobacco product is considered a "modified risk tobacco product" under section 911(b)(2)(A)(i) of the FD&C Act (21 U.S.C. § 387k(b)(2)(A)(i)) if its label, labeling, or advertising explicitly or implicitly represents that: (1) the product presents a lower risk of tobacco-related disease or is less harmful than one or more other commercially marketed tobacco products; (2) the product or its smoke contains a reduced level of a substance or presents a reduced exposure to a substance; or (3) the product or its smoke does not contain or is free of a substance. Under section 911(a) of the FD&C Act (21 U.S.C. § 387k(a)), no person may introduce or deliver for introduction into interstate commerce any modified risk tobacco product without an FDA order in effect under section 911(g) of the FD&C Act (21 U.S.C. § 387k(g)). A product that is in violation of section 911(a) of the FD&C Act (21 U.S.C. § 387k(a)) is adulterated under section 902(8) of the FD&C Act (21 U.S.C. § 387b(8)). Your product labeling for Natural American Spirit cigarettes, which uses the descriptors "Natural" and "Additive Free," represents explicitly and/or implicitly that the products or their smoke do not contain or are free of a substance and/or that the products present a lower risk of tobacco-related disease or are less harmful than one or more other commercially marketed tobacco products. As such, these products are modified risk tobacco products. Because these products are sold or distributed to customers in the United States without an appropriate FDA order in effect under section 911(g) of the FD&C Act (21 U.S.C. § 387k(g)), these products are adulterated under section 902(8) of the FD&C Act (21 U.S.C. § 387b(8)).

FDA recognizes that Santa Fe Natural Tobacco Company, Inc. has entered into a consent order with the Federal Trade Commission (FTC) regarding the company's use of additive free claims in tobacco product advertising (Federal Trade Commission, *In the Matter of Santa Fe Natural Tobacco Company, Inc., a corporation*, Docket No. C-3952, Decision and Order, Issued June 12, 2000). This order requires, in part, that the company display certain disclosures (e.g., "No additives in our tobacco does NOT mean safer") in any advertisements using claims that represent tobacco products as having no additives, unless the company possesses and relies upon competent and reliable scientific evidence demonstrating that such products pose materially lower health risks than other tobacco products of the same type. This consent order predates the Tobacco Control Act, which was enacted on June 22, 2009 and gave FDA authority to

regulate the manufacture, sale, distribution, and promotion of tobacco products, including authority over modified risk tobacco products under Section 911 of the FD&C Act (21 U.S.C. § 387k). As noted above, under section 911(a) of the FD&C Act (21 U.S.C. § 387k(a)), no person may introduce or deliver for introduction into interstate commerce any modified risk tobacco product without an FDA order in effect under section 911(g) of the FD&C Act (21 U.S.C. § 387k(g)). Because you sell or distribute modified risk tobacco products without an appropriate FDA order in effect under section 911(g) of the FD&C Act (21 U.S.C. § 387k(g)), you are in violation of the FD&C Act, notwithstanding your consent order with FTC.

### **Conclusion and Requested Actions**

The violations discussed in this letter do not necessarily constitute an exhaustive list. You should immediately correct the violations that are referenced above, as well as violations that are the same as or similar to those stated above, and take any necessary actions to bring your tobacco products into compliance with the FD&C Act.

It is your responsibility to ensure that your tobacco products and all related labeling and/or advertising comply with each applicable provision of the FD&C Act and FDA's implementing regulations. Failure to ensure full compliance with the FD&C Act may result in FDA initiating further action without notice, including, but not limited to, civil money penalties, criminal prosecution, seizure, and/or injunction. Please note that adulterated and misbranded tobacco products offered for import into the United States are subject to detention and refusal of admission.

Please submit a written response to this letter within 15 working days from the date of receipt describing your corrective actions, including the dates on which you discontinued the violative promotion, advertising, sale, and/or distribution of these tobacco products and your plan for maintaining compliance with the FD&C Act. If you do not believe that your products are in violation of the FD&C Act, include your reasoning and any supporting information for our consideration. You can find the FD&C Act through links on FDA's homepage at <http://www.fda.gov> (<http://www.fda.gov/>).

Please note your reference number, RW1500345, in your response and direct your response to the following address:

DPAL-WL Response, Office of Compliance and Enforcement  
FDA Center for Tobacco Products  
c/o Document Control Center  
Building 71, Room G335  
10903 New Hampshire Avenue  
Silver Spring, MD 20993-0002

If you have any questions about the content of this letter, please contact Ele Ibarra-Pratt at (301) 796-9235 or via email at [CTPCompliance@fda.hhs.gov](mailto:CTPCompliance@fda.hhs.gov)  
[\(mailto:CTPCompliance@fda.hhs.gov\)](mailto:CTPCompliance@fda.hhs.gov).

Sincerely,

/S/

Ann Simoneau, J.D.

Director

Office of Compliance and Enforcement

Center for Tobacco Products

**VIA UPS and FAX**

CC:

Susan M. Cameron

President and Chief Executive Officer

Reynolds American Inc.

401 North Main Street

Winston-Salem, NC 27101-3804

Dr. James Swauger

Vice President Regulatory Oversight

401 North Main Street

Winston-Salem, NC 27102

**More in 2015**

[\(/ICECI/EnforcementActions/WarningLetters/2015/default.htm\)](#)

# Exhibit 9

61-64001939 Natural American Spirit Dark Green 84mm CPB

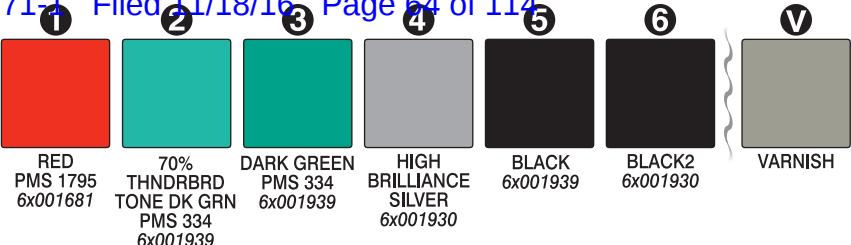


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141293  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001939\_NASpiritDkGrn84Cx



- Addition of PEFC logo
- Back Panel Redesign

Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

*This print is to be used for position only. It is not to be used for photographic purposes.*

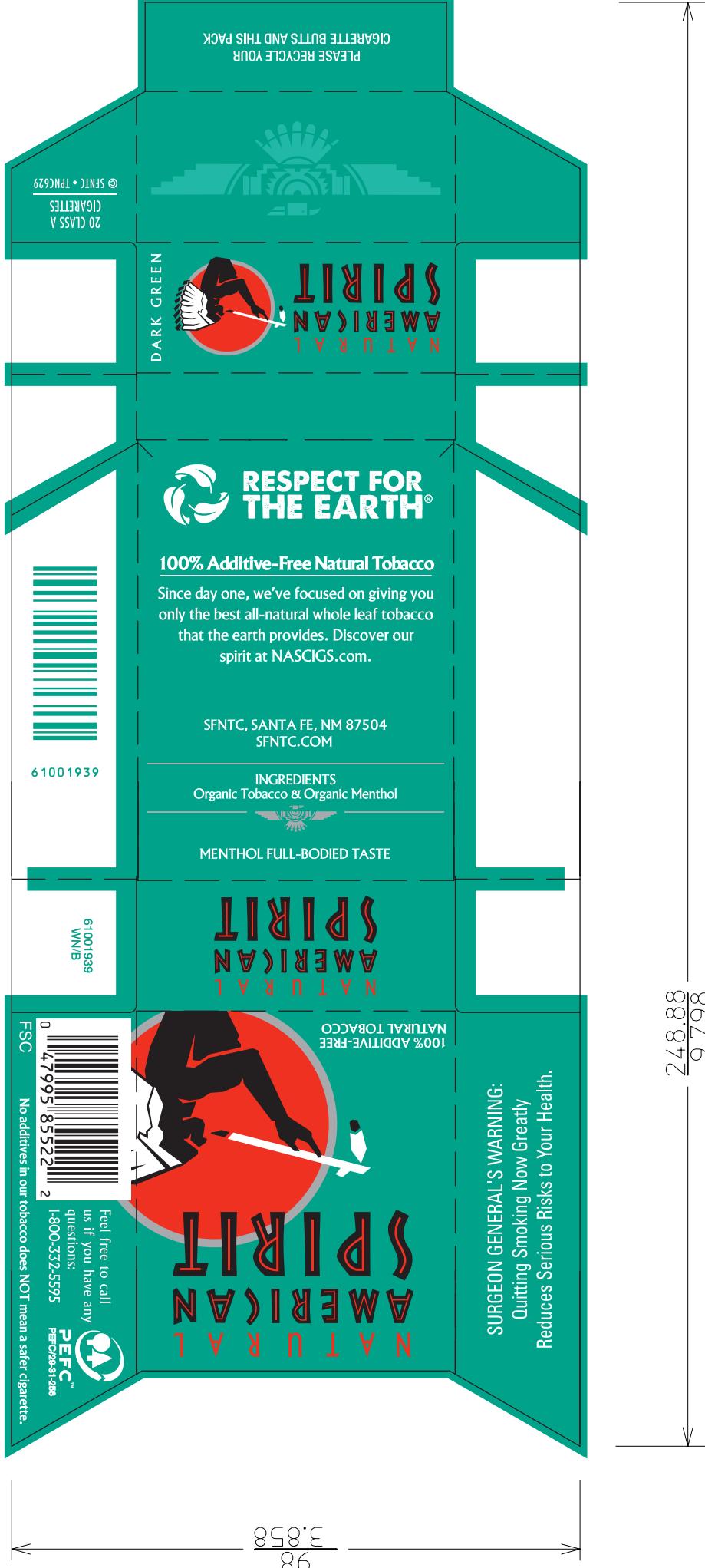
*Colors used on this print are not accurate. They represent a best effort to approach actual colors.*

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001939 Natural American Spirit Dark Green 84mm CPB

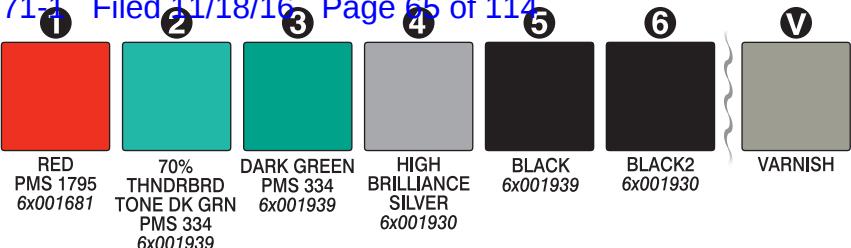


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141293  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001939\_NASpiritDkGrn84Cx



- Addition of PEFC logo
- Back Panel Redesign

Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

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## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001939 Natural American Spirit Dark Green 84mm CPB

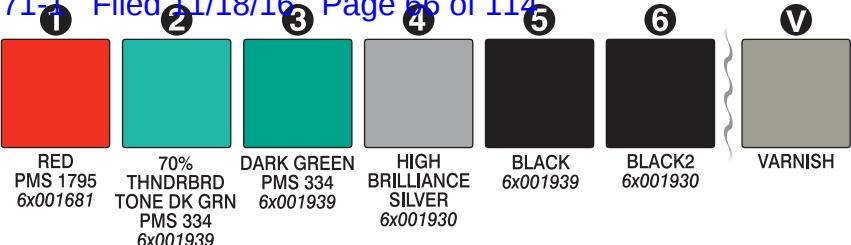


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
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## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
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61-64001939 Natural American Spirit Dark Green 84mm CPB

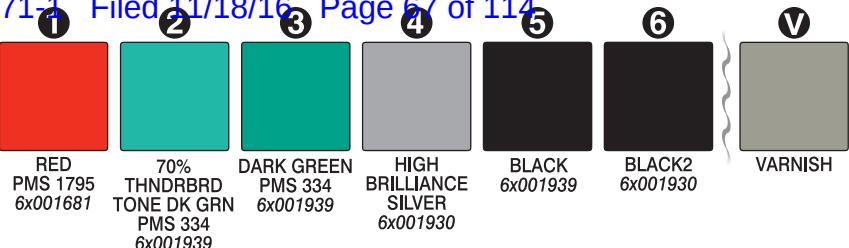


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## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

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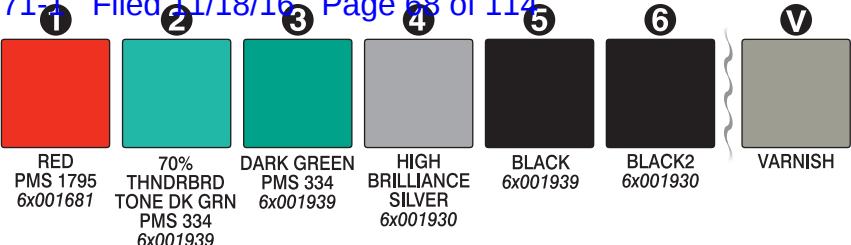


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DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141293  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001939\_NASpiritDkGrn84Cx



- Addition of PEFC logo
- Back Panel Redesign

Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

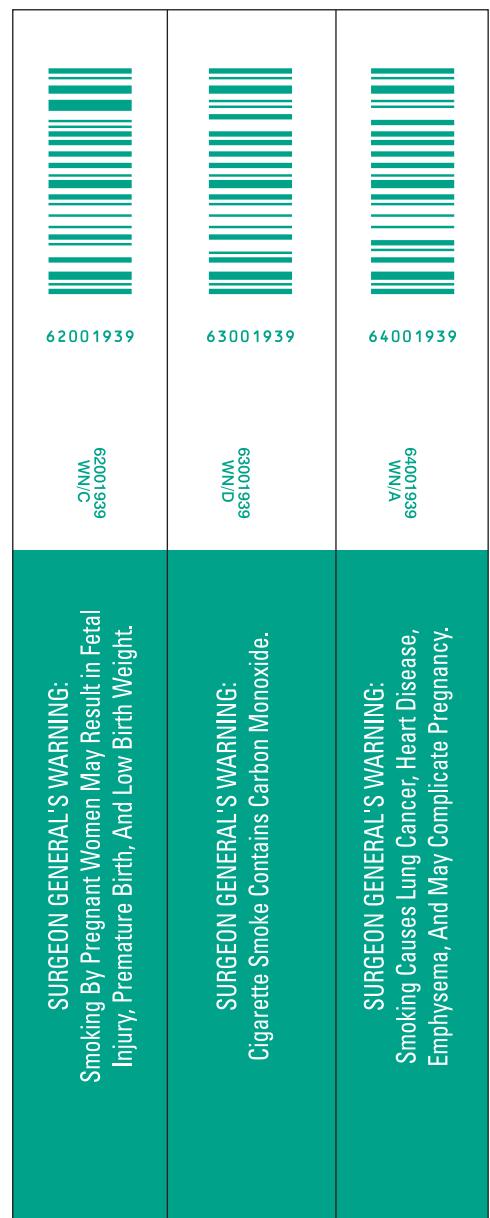
*This print is to be used for position only. It is not to be used for photographic purposes.  
 Colors used on this print are not accurate. They represent a best effort to approach actual colors.*

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

NM/NYC

NM/NYC

NM/NYC

62001939

63001939

64001939

61001939

REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001673	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

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## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001939 Natural American Spirit Dark Green 84mm CPB

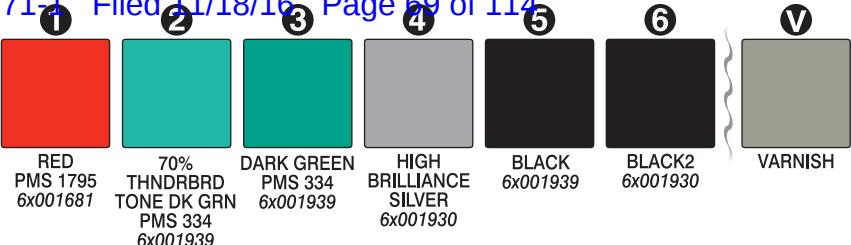


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
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 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001939\_NASpiritDkGrn84Cx



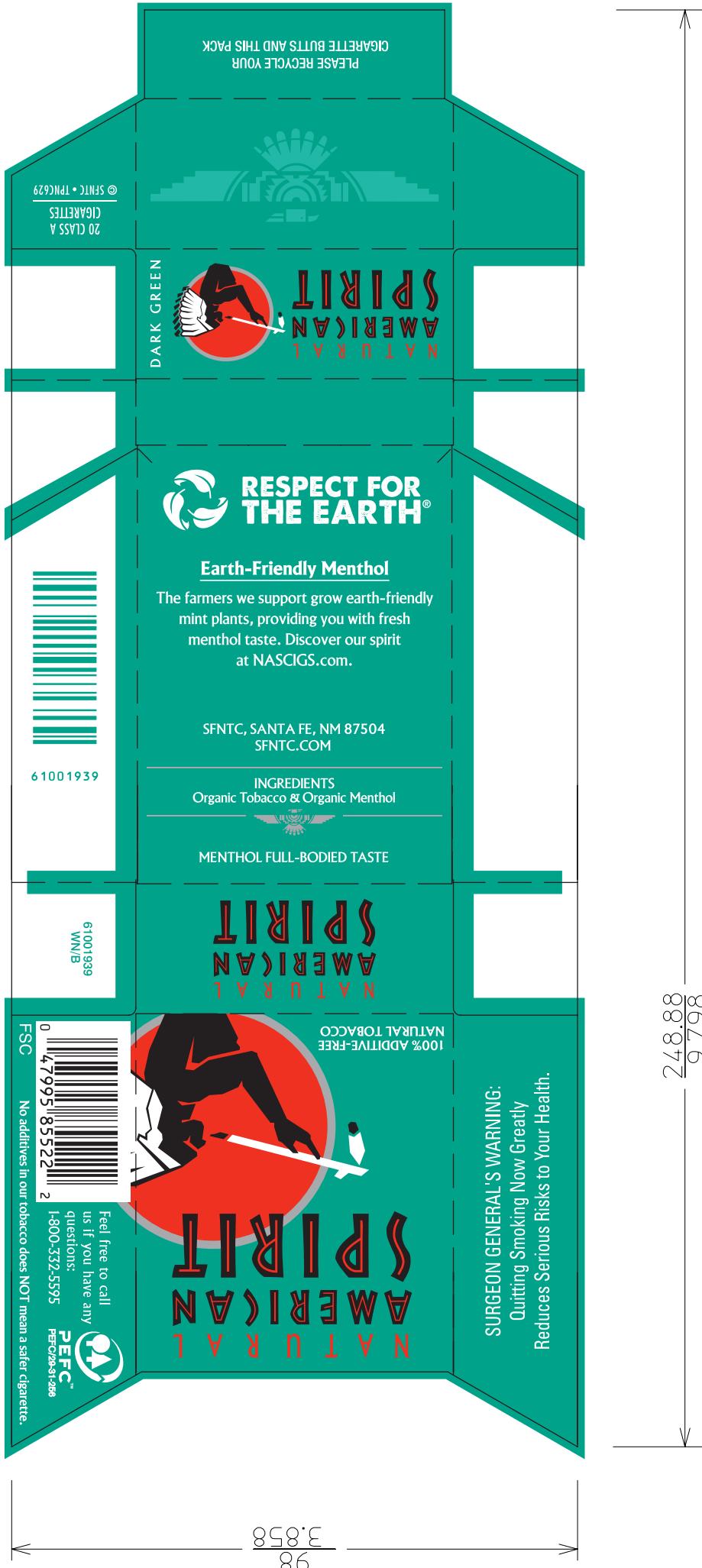
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- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001673	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

MRM# 1130207

FILE RELEASED  
 08.13.15

# Exhibit 10

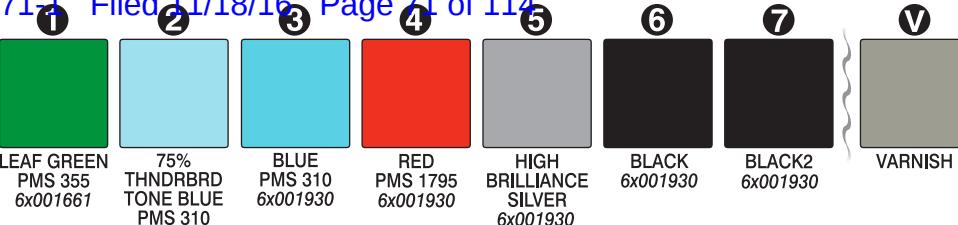
61-64001930 Natural American Spirit Blue 84mm CPB



4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ  
PHONE: 336.369.4733

DRAWING & ISSUE DATE — SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION — Santa Fe FTB KS  
 MATERIAL — Board Stock  
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 PROJECT # — 4039130  
 ART PRODUCTION DATE — 01.20.15  
 FILE NAME — 61-64001930\_NASpiritBlue84Cx



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- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING: Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.	SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.	SURGEON GENERAL'S WARNING: Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.
62001930 62001930	63001930 63001930	64001930 64001930

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001930 Natural American Spirit Blue 84mm CPB



**SGS**  
Southern Graphic Systems

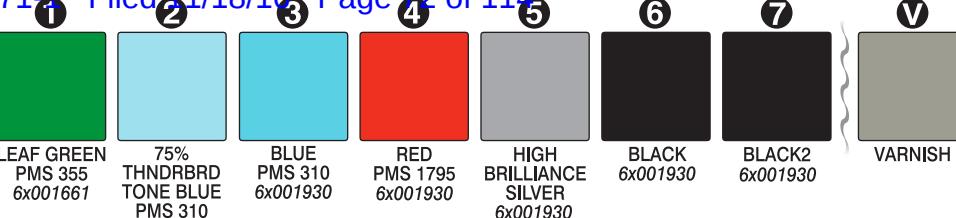
4322 Piedmont Parkway • Greensboro, NC 27410

**DESIGNER: SRJ**

PHONE: 336.369.4733

REFERENCE ART: ALT

DRAWING & ISSUE DATE — SFCX1\_A 12-13-13  
DRAWING DESCRIPTION — Santa Fe FTB KS  
MATERIAL — Board Stock  
SOFTWARE — Illustrator CS6  
COLOR STANDARD — 141284  
PROJECT # — 4039130  
ART PRODUCTION DATE — 01.20.15  
FILE NAME — 61-64001930\_NASpiritBlue84Cx



REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001661	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe/Natural Tobacco Company/American Spirit/Boxes

- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
  - Futura Std
  - Helvetica Neue LT Std

## **CLIP ART:**

- N/A



**SURGEON GENERAL'S WARNING:  
Smoking By Pregnant Women May Result in Fetal  
Injury, Premature Birth, And Low Birth Weight.**

**SURGEON GENERAL'S WARNING:  
Cigarette Smoke Contains Carbon Monoxide.**

**SURGEON GENERAL'S WARNING:  
Smoking Causes Lung Cancer, Heart Disease,  
Emphysema, And May Complicate Pregnancy.**

 <p><b>SURGEON GENERAL'S WARNING:</b> Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.</p>	 <p><b>SURGEON GENERAL'S WARNING:</b> Cigarette Smoke Contains Carbon Monoxide.</p>	 <p><b>SURGEON GENERAL'S WARNING:</b> Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.</p>
--	--	--

MRM# 1130207

FILE RELEASED  
08.13.15

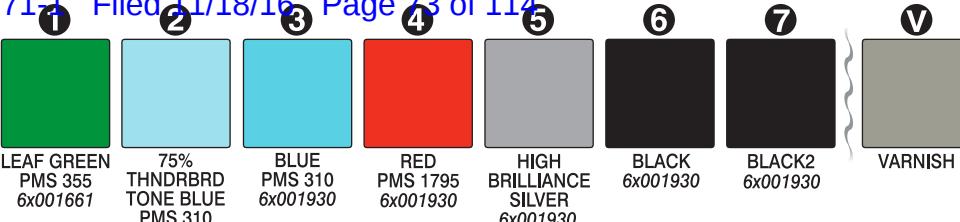
61-64001930 Natural American Spirit Blue 84mm CPB



4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ  
PHONE: 336.369.4733

DRAWING & ISSUE DATE — SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION — Santa Fe FTB KS  
 MATERIAL — Board Stock  
 SOFTWARE — Illustrator CS6  
 COLOR STANDARD — 141284  
 PROJECT # — 4039130  
 ART PRODUCTION DATE — 01.20.15  
 FILE NAME — 61-64001930\_NASpiritBlue84Cx



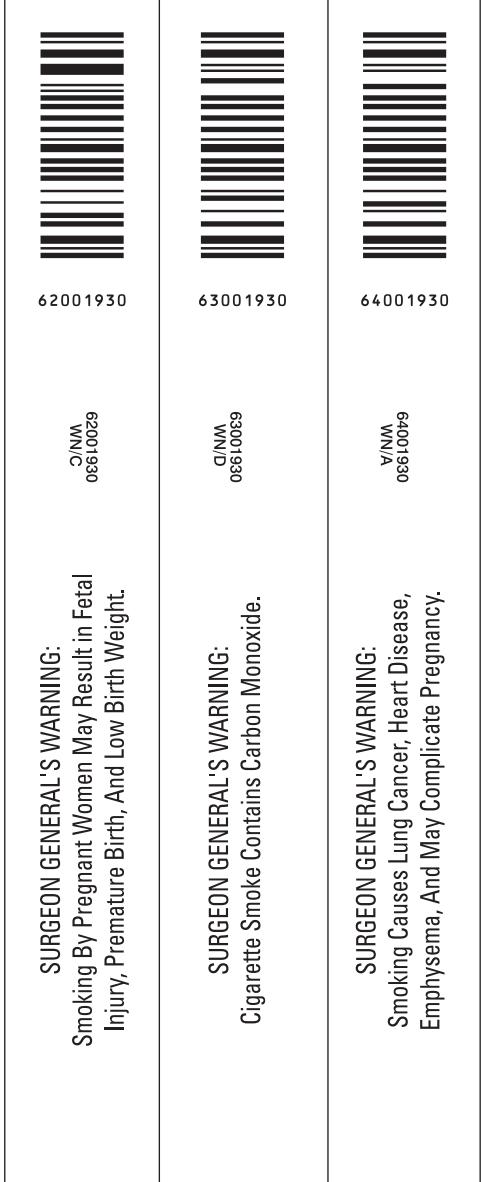
- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001930 Natural American Spirit Blue 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING &amp; ISSUE DATE — SFCX1\_A 12-13-13

DRAWING DESCRIPTION — Santa Fe FTB KS

MATERIAL — Board Stock

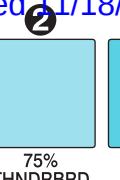
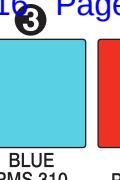
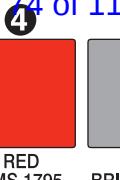
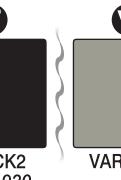
SOFTWARE — Illustrator CS6

COLOR STANDARD — 141284

PROJECT # — 4039130

ART PRODUCTION DATE — 01.20.15

FILE NAME — 61-64001930\_NASpiritBlue84Cx

LEAF GREEN  
PMS 355  
6x00166175%  
THNDRBRD  
TONE BLUE  
PMS 310  
6x001930BLUE  
PMS 310  
6x001930RED  
PMS 1795  
6x001930HIGH  
BRILLIANCE  
SILVER  
6x001930BLACK  
6x001930BLACK2  
6x001930

VARNISH

REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001661	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

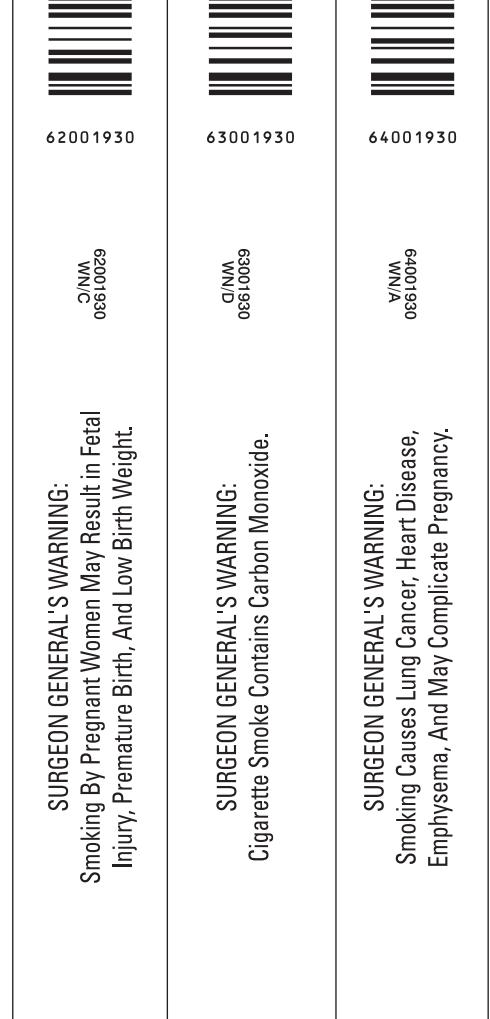
- This print is to be used for position only. It is not to be used for photographic purposes.
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## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

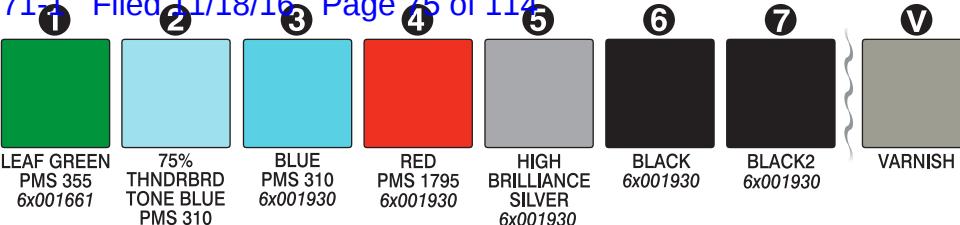
61-64001930 Natural American Spirit Blue 84mm CPB



4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ  
PHONE: 336.369.4733

DRAWING & ISSUE DATE — SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION — Santa Fe FTB KS  
 MATERIAL — Board Stock  
 SOFTWARE — Illustrator CS6  
 COLOR STANDARD — 141284  
 PROJECT # — 4039130  
 ART PRODUCTION DATE — 01.20.15  
 FILE NAME — 61-64001930\_NASpiritBlue84Cx



REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001661	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

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## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.  
Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

62001930 63001930 64001930  
61001930 61001930 61001930  
62001930 63001930 64001930

MRM# 1130207

FILE RELEASED  
08.13.15

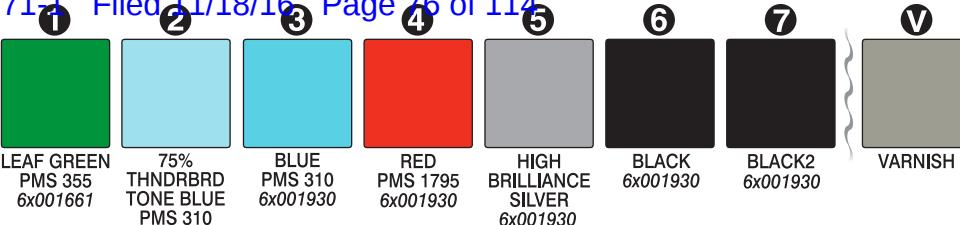
61-64001930 Natural American Spirit Blue 84mm CPB



4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ  
PHONE: 336.369.4733

DRAWING & ISSUE DATE — SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION — Santa Fe FTB KS  
 MATERIAL — Board Stock  
 SOFTWARE — Illustrator CS6  
 COLOR STANDARD — 141284  
 PROJECT # — 4039130  
 ART PRODUCTION DATE — 01.20.15  
 FILE NAME — 61-64001930\_NASpiritBlue84Cx



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- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001661	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

## CLIP ART:

- N/A

## CLIP ART:

# Exhibit 11

61-64001938 Natural American Spirit Gold 84mm CPB

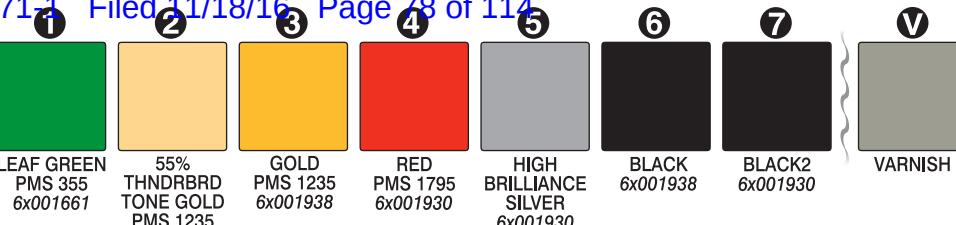


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141292  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001938\_NASpiritGold84Cx



- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



**SURGEON GENERAL'S WARNING:**  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

**SURGEON GENERAL'S WARNING:**  
 Cigarette Smoke Contains Carbon Monoxide.

**SURGEON GENERAL'S WARNING:**  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001938 Natural American Spirit Gold 84mm CPB

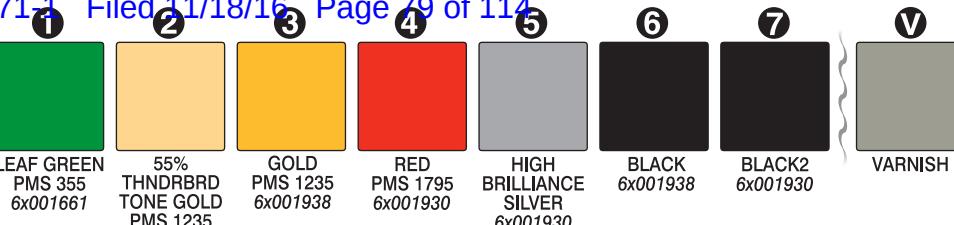


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141292  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001938\_NASpiritGold84Cx



• This print is to be used for position only. It is not to be used for photographic purposes.

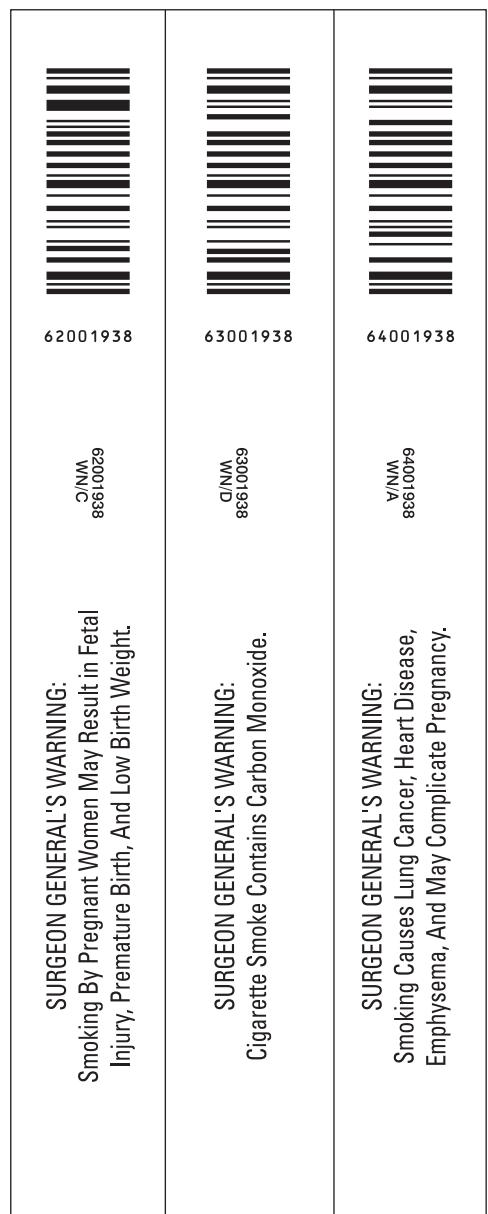
• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001938 Natural American Spirit Gold 84mm CPB

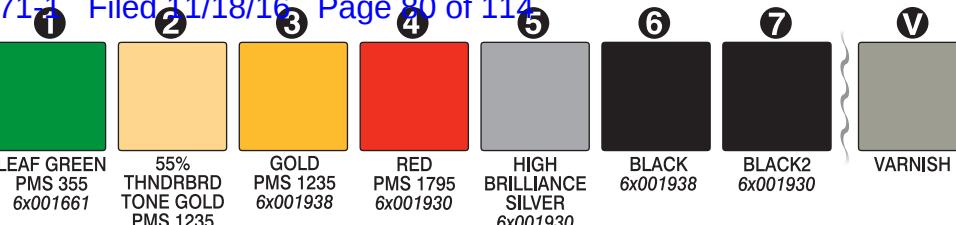


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141292  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001938\_NASpiritGold84Cx



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## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



62001938  
62001938  
62001938

SURGEON GENERAL'S WARNING:  
Smoking Causes Lung Cancer, Heart Disease,  
Emphysema, And May Complicate Pregnancy.  
Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
Smoking Causes Lung Cancer, Heart Disease,  
Emphysema, And May Complicate Pregnancy.

63001938  
63001938  
63001938

64001938  
64001938  
64001938

61001938  
61001938  
61001938

04799585525  
PEFC  
PEFC2004  
No additives in our tobacco does NOT mean a safe cigarette.

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001938 Natural American Spirit Gold 84mm CPB



4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141292  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001938\_NASpiritGold84Cx



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- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

62001938  
62001938  
63001938  
63001938  
64001938  
64001938  
61001938  
61001938  
61001938  
61001938

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001938 Natural American Spirit Gold 84mm CPB

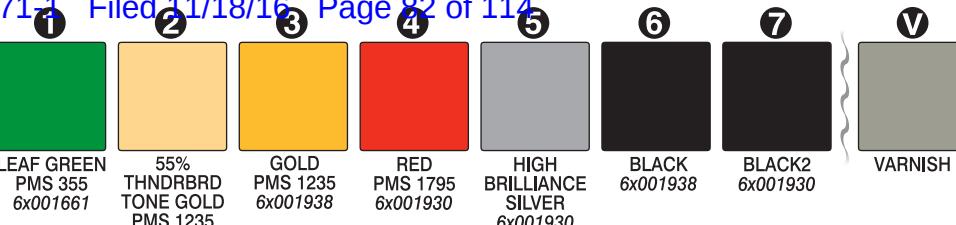


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141292  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001938\_NASpiritGold84Cx



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- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



**SURGEON GENERAL'S WARNING:**  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

**SURGEON GENERAL'S WARNING:**  
 Cigarette Smoke Contains Carbon Monoxide.

**SURGEON GENERAL'S WARNING:**  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.



62001938



63001938



64001938



MRM# 1130207

FILE RELEASED  
08.13.15



## Exhibit 12

61-64001937 Natural American Spirit Turquoise 84mm CPB

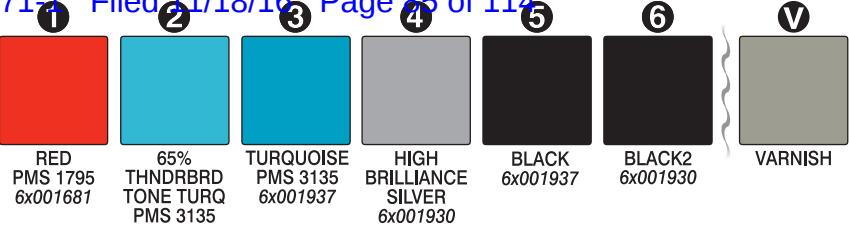


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141291  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 04.20.15  
 FILE NAME – 61-64001937\_NASpiritTurq84Cx



• This print is to be used for position only. It is not to be used for photographic purposes.

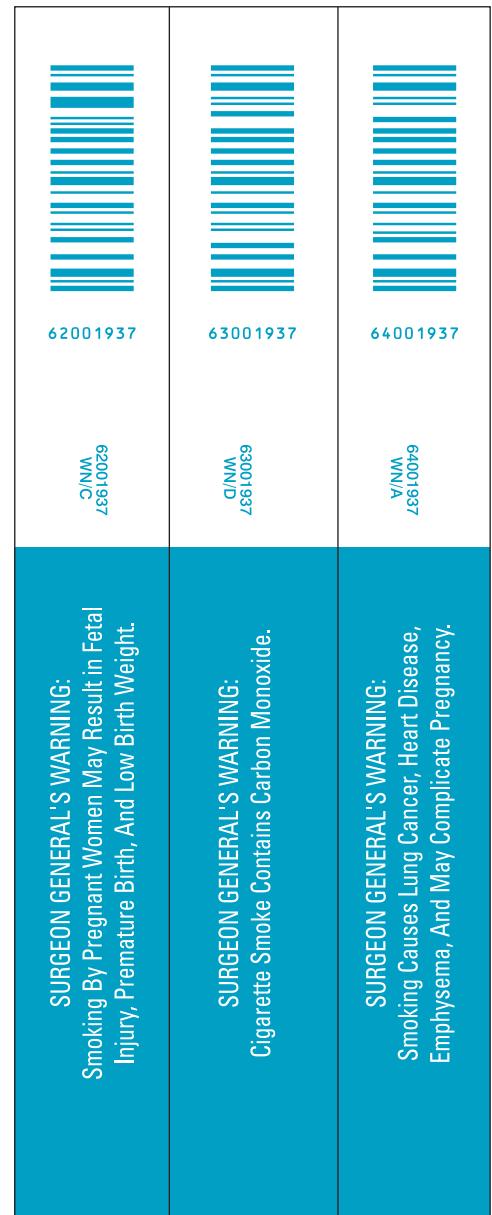
• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

MRM# 1130207

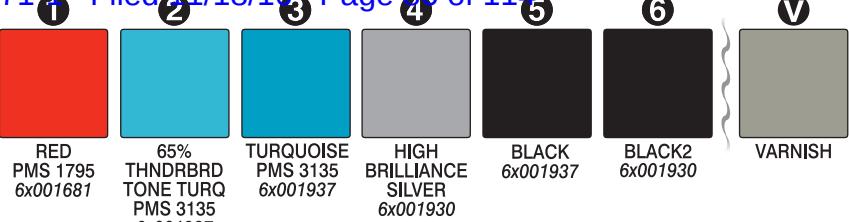
FILE RELEASED  
08.13.15

61-64001937 Natural American Spirit Turquoise 84mm CPB



**SGS**  
Southern Graphic Systems

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
DRAWING DESCRIPTION – Santa Fe FTB KS  
MATERIAL – Board Stock  
SOFTWARE – Illustrator CS6  
COLOR STANDARD – 141291  
PROJECT # – 4039130  
ART PRODUCTION DATE – 04.20.15  
FILE NAME – 61-64001937\_NASpiritTurq84Cx



REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001687	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

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## FONTS:

- Albertus
  - Futura Std
  - Helvetica Neue LT Std

**CLIP ART:**

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001937 Natural American Spirit Turquoise 84mm CPB

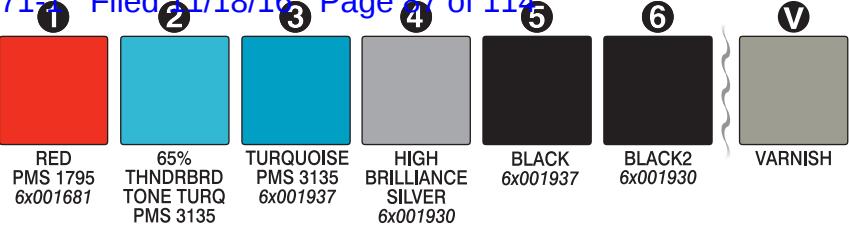


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141291  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 04.20.15  
 FILE NAME – 61-64001937\_NASpiritTurq84Cx



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## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001937 Natural American Spirit Turquoise 84mm CPB

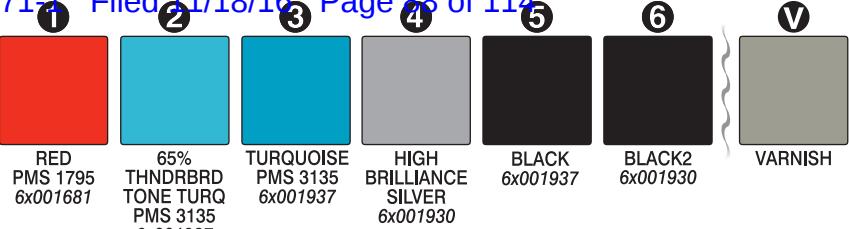


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141291  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 04.20.15  
 FILE NAME – 61-64001937\_NASpiritTurq84Cx



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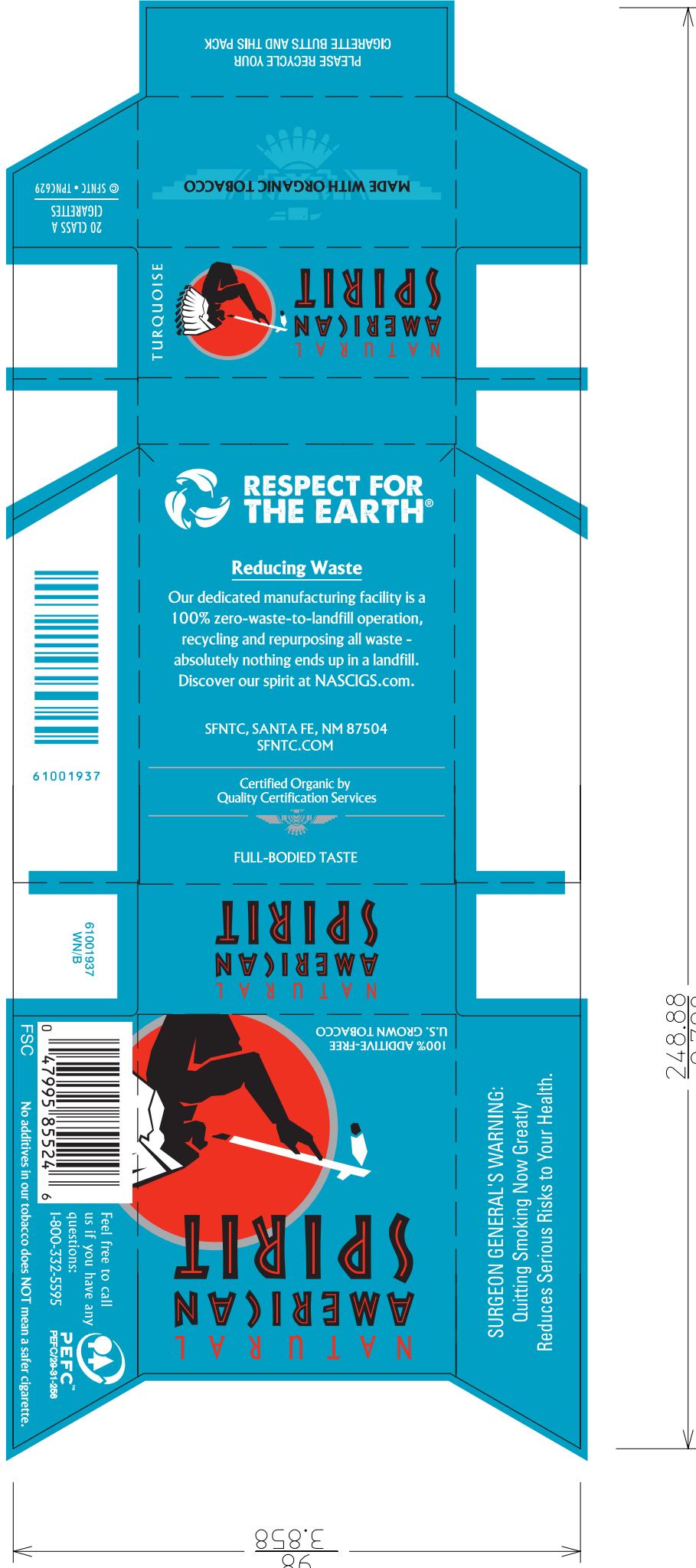
• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

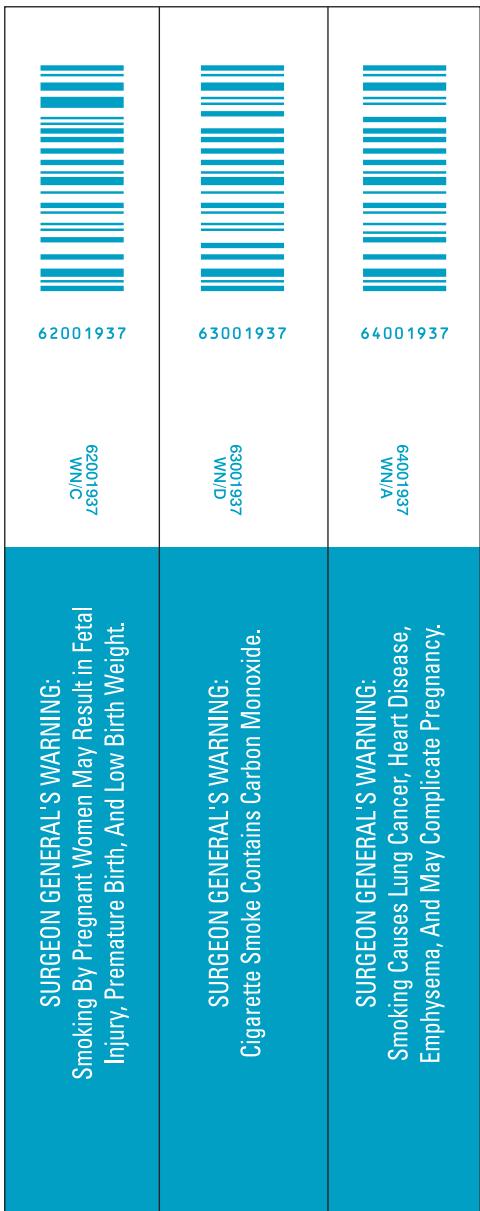
- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001937 Natural American Spirit Turquoise 84mm CPB

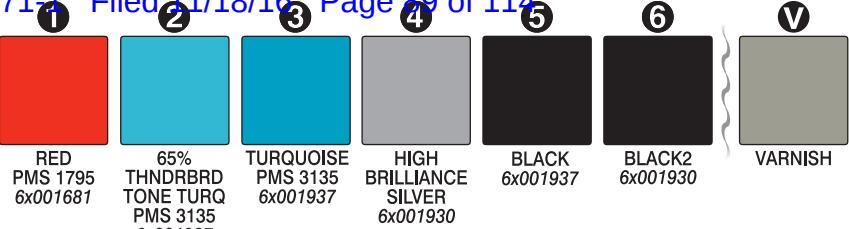


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141291  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 04.20.15  
 FILE NAME – 61-64001937\_NASpiritTurq84Cx



*This print is to be used for position only. It is not to be used for photographic purposes.*

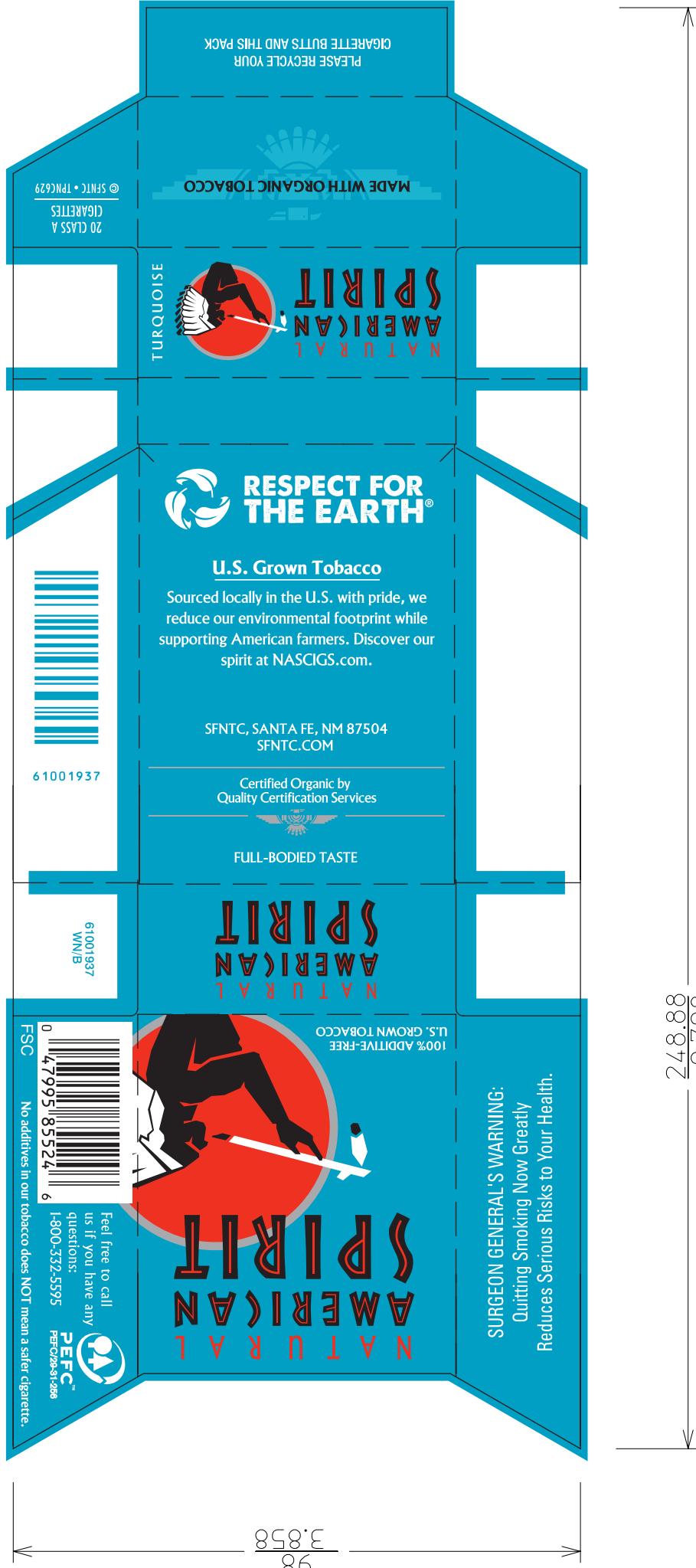
*Colors used on this print are not accurate. They represent a best effort to approach actual colors.*

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001937 Natural American Spirit Turquoise 84mm CPB

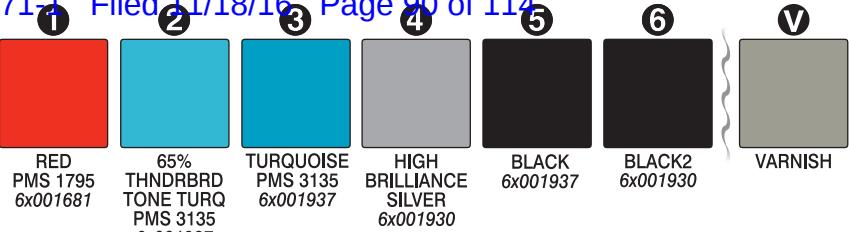


4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141291  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 04.20.15  
 FILE NAME – 61-64001937\_NASpiritTurq84Cx



- Addition of PEFC logo
- Back Panel Redesign

Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

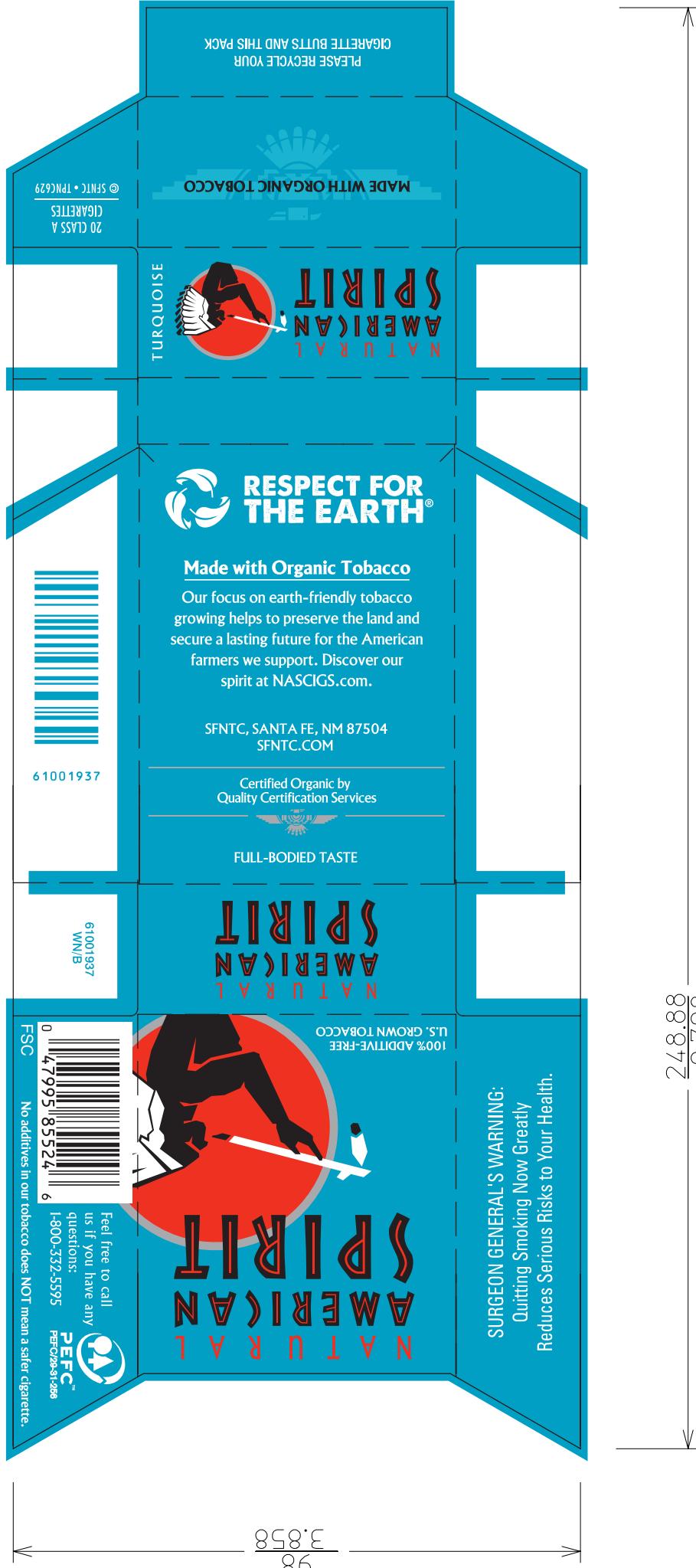
*This print is to be used for position only. It is not to be used for photographic purposes.  
 Colors used on this print are not accurate. They represent a best effort to approach actual colors.*

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

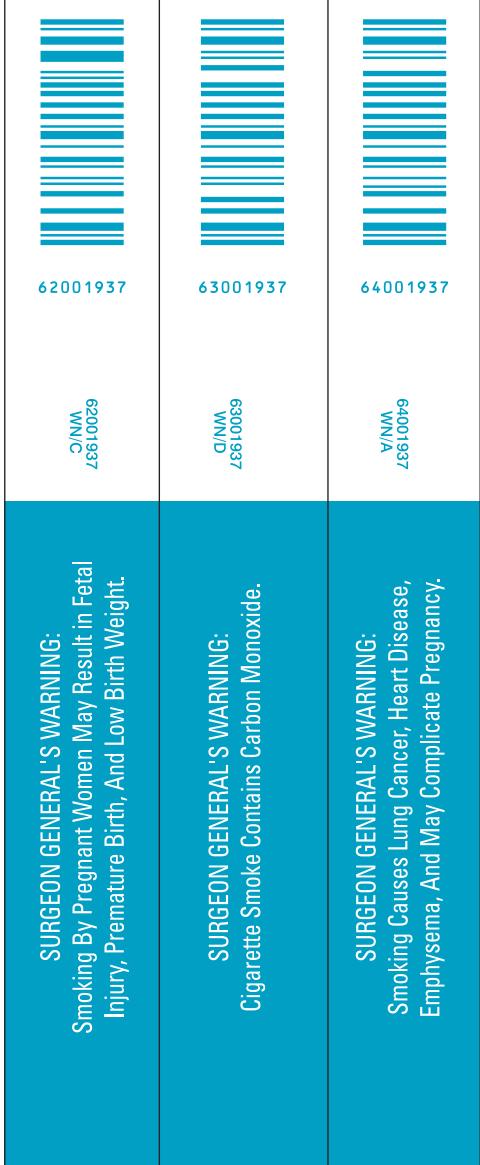
- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.



MRM# 1130207

FILE RELEASED  
08.13.15

# Exhibit 13

61-64001940 Natural American Spirit Green 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING &amp; ISSUE DATE – SFCX1\_A 12-13-13

DRAWING DESCRIPTION – Santa Fe FTB KS

MATERIAL – Board Stock

SOFTWARE – Illustrator CS6

COLOR STANDARD – 141294

PROJECT # – 4039130

ART PRODUCTION DATE – 01.20.15

FILE NAME – 61-64001940\_NASpiritGrn84Cx

1  
LEAF GREEN  
PMS 355  
6x0016612  
70% THNDRBRD  
TONE GREEN  
PMS 360  
6x0019333  
GREEN  
PMS 360  
6x0019404  
RED  
PMS 1795  
6x0019305  
HIGH BRILLIANCE SILVER  
6x0019306  
BLACK  
6x0019407  
BLACK2  
6x001930V  
VARNISH

- Addition of PEFC logo  
• Back Panel Redesign

Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

This print is to be used for position only. It is not to be used for photographic purposes.

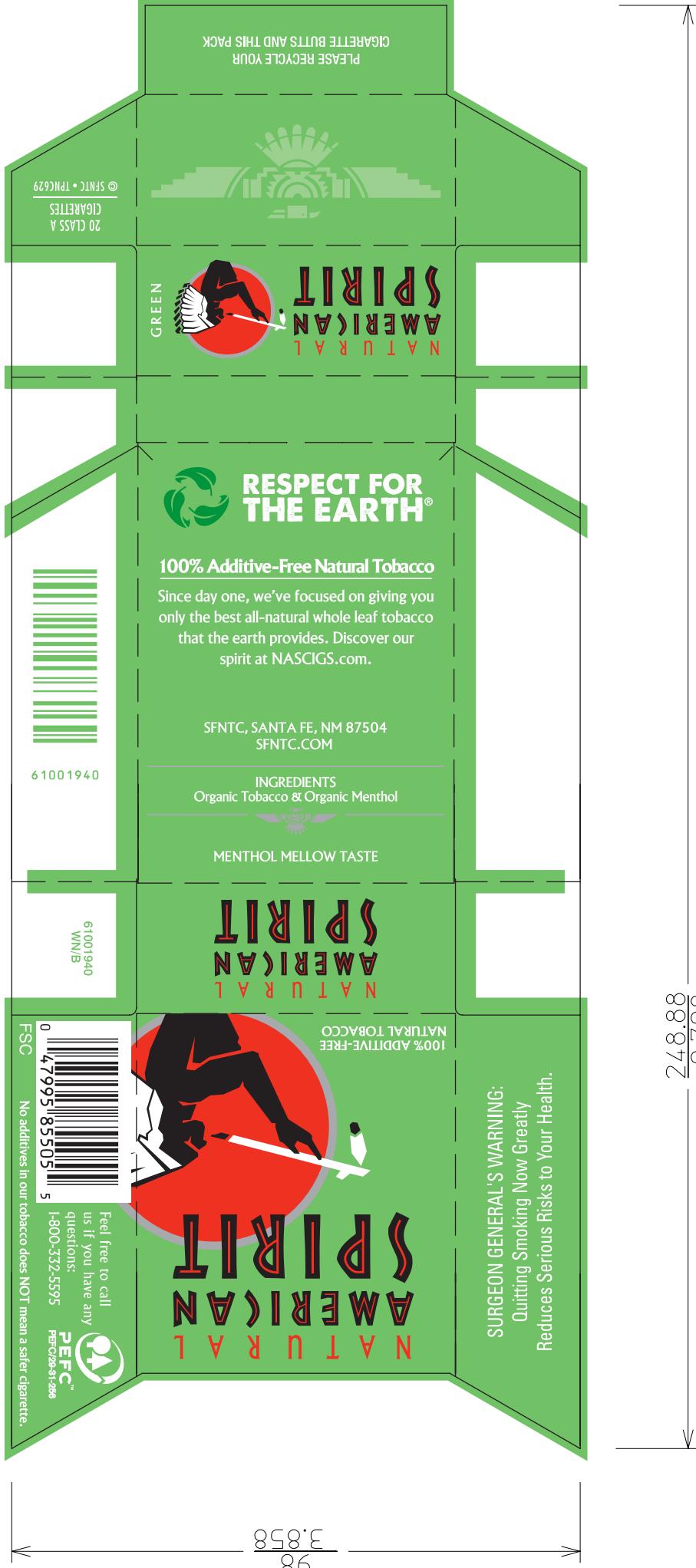
Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001940 Natural American Spirit Green 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING &amp; ISSUE DATE – SFCX1\_A 12-13-13

DRAWING DESCRIPTION – Santa Fe FTB KS

MATERIAL – Board Stock

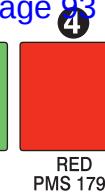
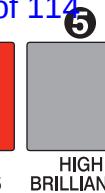
SOFTWARE – Illustrator CS6

COLOR STANDARD – 141294

PROJECT # – 4039130

ART PRODUCTION DATE – 01.20.15

FILE NAME – 61-64001940\_NASpiritGrn84Cx

LEAF GREEN  
PMS 355  
6x00166170%  
THNDRBRD  
TONE GREEN  
PMS 360  
6x001933GREEN  
PMS 360  
6x001940RED  
PMS 1795  
6x001930HIGH  
BRILLIANCE  
SILVER  
6x001930BLACK  
6x001940BLACK2  
6x001930

VARNISH

REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001675	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001940 Natural American Spirit Green 84mm CPB



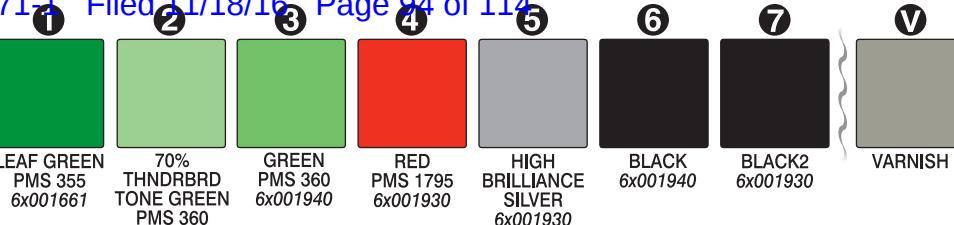
Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141294  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001940\_NASpiritGrn84Cx



- Addition of PEFC logo  
 • Back Panel Redesign

Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

*This print is to be used for position only. It is not to be used for photographic purposes.  
 Colors used on this print are not accurate. They represent a best effort to approach actual colors.*

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
 Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

MRM# 1130207

FILE RELEASED  
 08.13.15

61-64001940 Natural American Spirit Green 84mm CPB



4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING &amp; ISSUE DATE – SFCX1\_A 12-13-13

DRAWING DESCRIPTION – Santa Fe FTB KS

MATERIAL – Board Stock

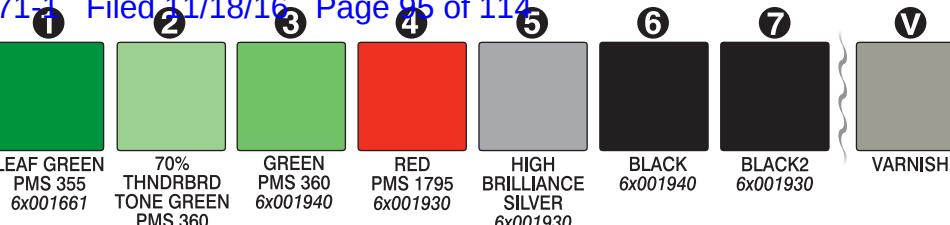
SOFTWARE – Illustrator CS6

COLOR STANDARD – 141294

PROJECT # – 4039130

ART PRODUCTION DATE – 01.20.15

FILE NAME – 61-64001940\_NASpiritGrn84Cx



• This print is to be used for position only. It is not to be used for photographic purposes.

• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



SURGEON GENERAL'S WARNING:  
Smoking By Pregnant Women May Result in Fetal  
Injury, Premature Birth, And Low Birth Weight.

SURGEON GENERAL'S WARNING:  
Cigarette Smoke Contains Carbon Monoxide.

SURGEON GENERAL'S WARNING:  
Smoking Causes Lung Cancer, Heart Disease,  
Emphysema, And May Complicate Pregnancy.

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001940 Natural American Spirit Green 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING &amp; ISSUE DATE – SFCX1\_A 12-13-13

DRAWING DESCRIPTION – Santa Fe FTB KS

MATERIAL – Board Stock

SOFTWARE – Illustrator CS6

COLOR STANDARD – 141294

PROJECT # – 4039130

ART PRODUCTION DATE – 01.20.15

FILE NAME – 61-64001940\_NASpiritGrn84Cx

1

2

3

4

5

6

7

V

LEAF GREEN  
PMS 355  
6x00166170%  
THNDRBRD  
TONE GREEN  
PMS 360  
6x001933GREEN  
PMS 360  
6x001940RED  
PMS 1795  
6x001930HIGH  
BRILLIANCE  
SILVER  
6x001930BLACK  
6x001940BLACK2  
6x001930

VARNISH

REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001675	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

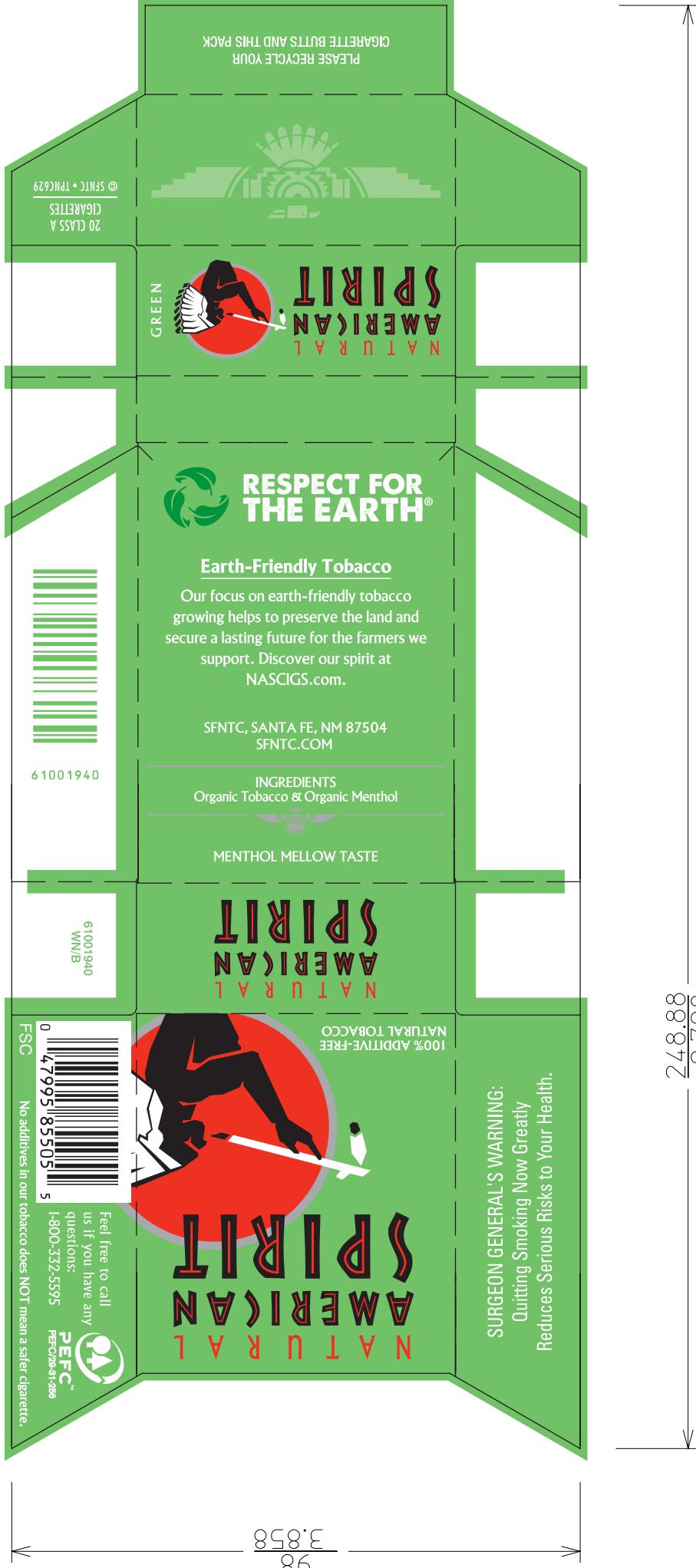
- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001940 Natural American Spirit Green 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING &amp; ISSUE DATE – SFCX1\_A 12-13-13

DRAWING DESCRIPTION – Santa Fe FTB KS

MATERIAL – Board Stock

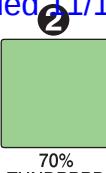
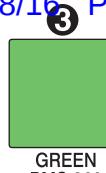
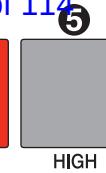
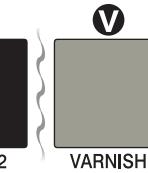
SOFTWARE – Illustrator CS6

COLOR STANDARD – 141294

PROJECT # – 4039130

ART PRODUCTION DATE – 01.20.15

FILE NAME – 61-64001940\_NASpiritGrn84Cx

LEAF GREEN  
PMS 355  
6x00166170%  
TONE GREEN  
PMS 360  
6x001933GREEN  
PMS 360  
6x001940RED  
PMS 1795  
6x001930HIGH  
BRILLIANCE  
SILVER  
6x001930BLACK  
6x001940BLACK2  
6x001930

VARNISH

REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001675	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

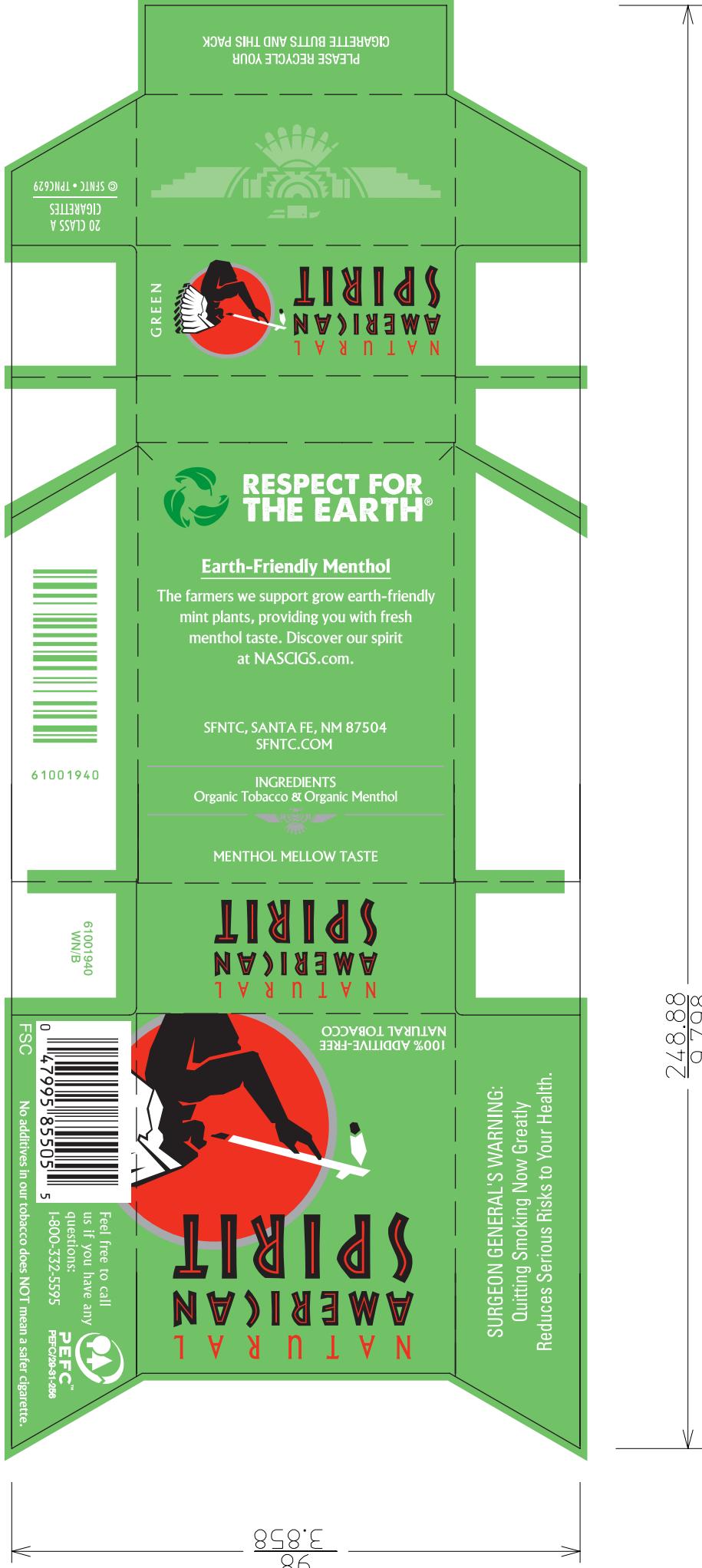
- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

# Exhibit 14

61-64001931 Natural American Spirit Yellow 84mm CPB



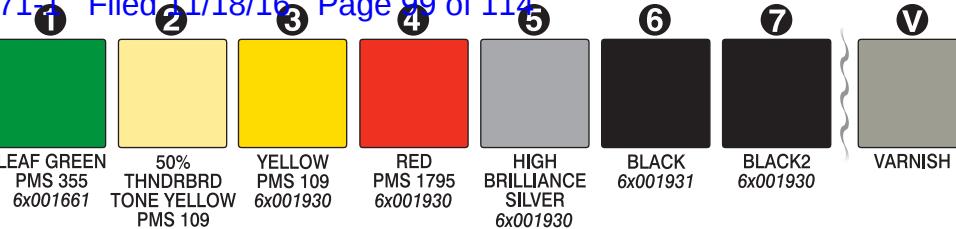
Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141285  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001931\_NASpiritYellow84Cx



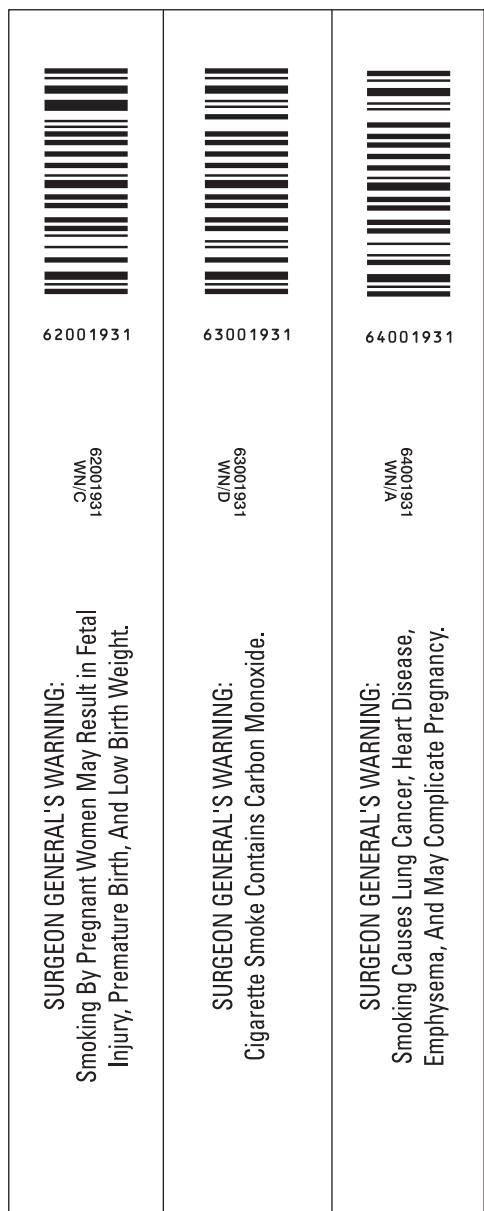
- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001931 Natural American Spirit Yellow 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141285  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001931\_NASpiritYellow84Cx



- This print is to be used for position only. It is not to be used for photographic purposes.

• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



**SURGEON GENERAL'S WARNING:**  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

**SURGEON GENERAL'S WARNING:**  
 Cigarette Smoke Contains Carbon Monoxide.

**SURGEON GENERAL'S WARNING:**  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

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64001931

MRM# 1130207

FILE RELEASED  
08.13.15

61-64001931 Natural American Spirit Yellow 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141285  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001931\_NASpiritYellow84Cx



REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001663	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

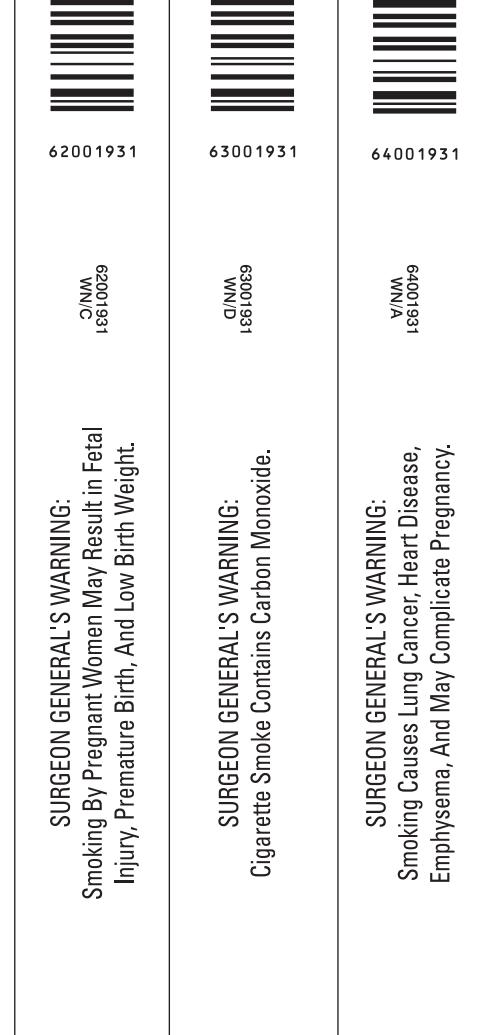
- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001931 Natural American Spirit Yellow 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141285  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001931\_NASpiritYellow84Cx



- This print is to be used for position only. It is not to be used for photographic purposes.

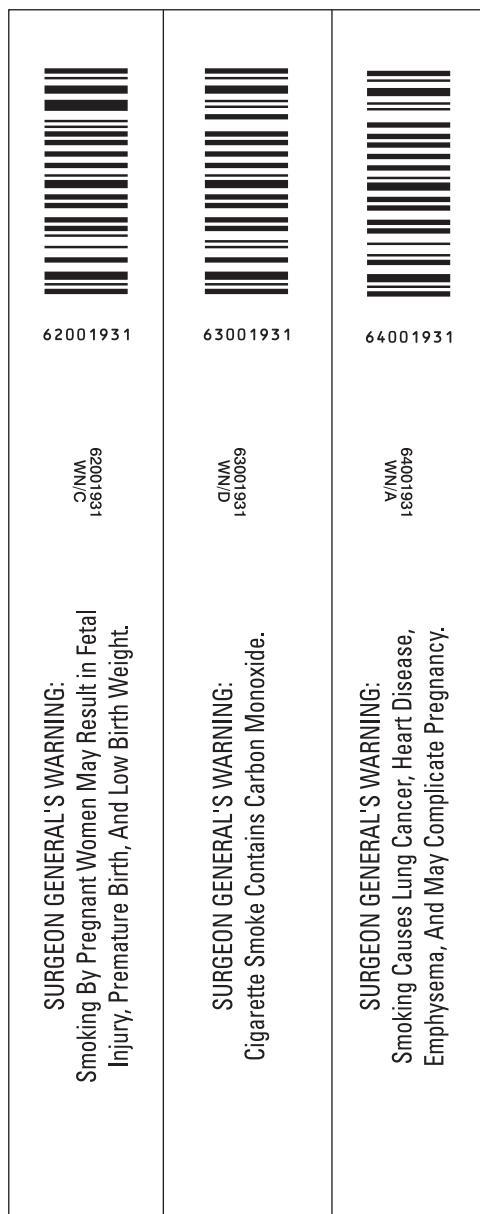
• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001931 Natural American Spirit Yellow 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141285  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001931\_NASpiritYellow84Cx



- This print is to be used for position only. It is not to be used for photographic purposes.

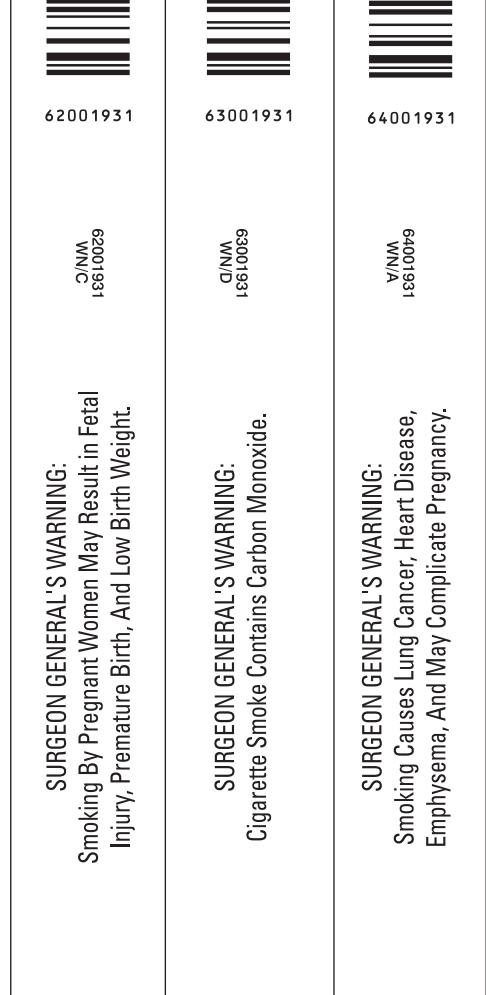
• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

61-64001931 Natural American Spirit Yellow 84mm CPB



Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS6  
 COLOR STANDARD – 141285  
 PROJECT # – 4039130  
 ART PRODUCTION DATE – 01.20.15  
 FILE NAME – 61-64001931\_NASpiritYellow84Cx



REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001663	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

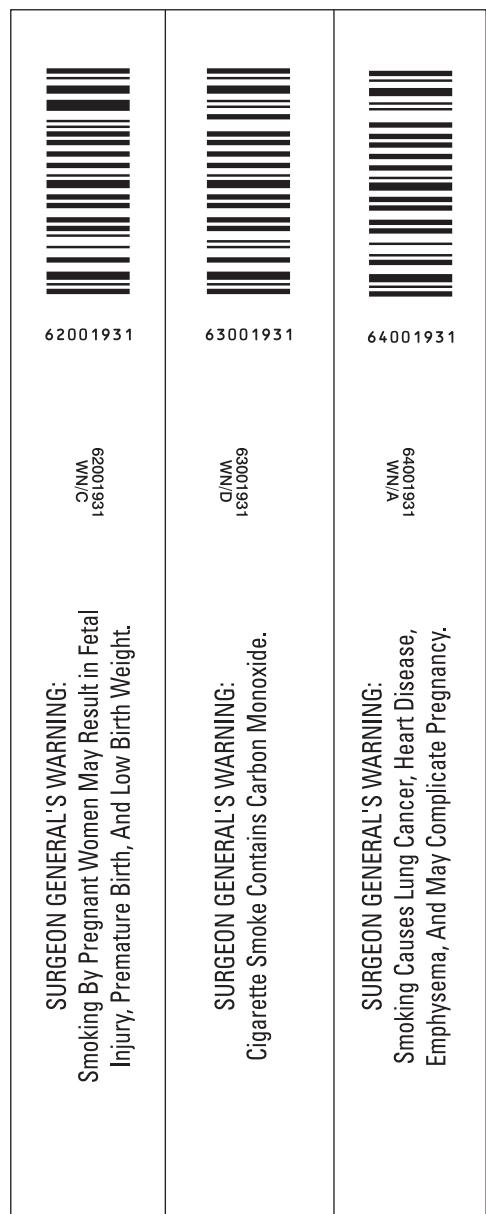
- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



MRM# 1130207

FILE RELEASED  
08.13.15

## Exhibit 15

61-64001727 Natural American Spirit Perique Robust 84mm CPB



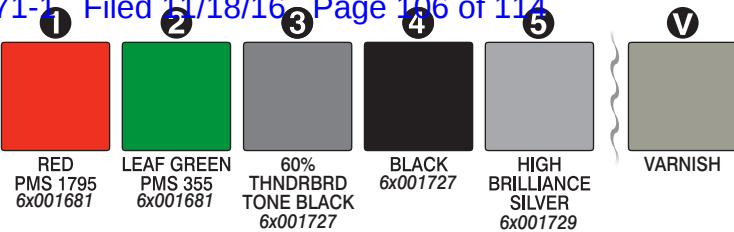
Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS5  
 COLOR STANDARD – 141264  
 PROJECT # – 4026164  
 ART PRODUCTION DATE – 12.08.14  
 FILE NAME – 61-64001727\_NASpiritPeriqueRobust84Cx



• This print is to be used for position only. It is not to be used for photographic purposes.

• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



**SURGEON GENERAL'S WARNING:**  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

**SURGEON GENERAL'S WARNING:**  
 Cigarette Smoke Contains Carbon Monoxide.

**SURGEON GENERAL'S WARNING:**  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

MRM# 1129628

FILE RELEASED  
08.06.15

61-64001727 Natural American Spirit Perique Robust 84mm CPB



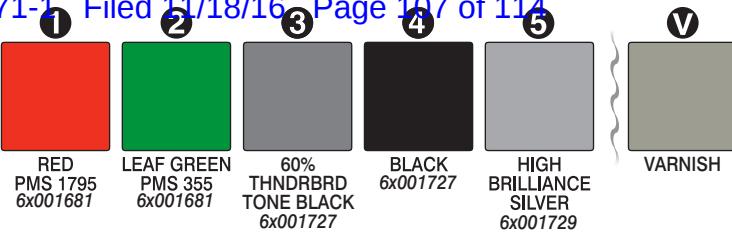
Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS5  
 COLOR STANDARD – 141264  
 PROJECT # – 4026164  
 ART PRODUCTION DATE – 12.08.14  
 FILE NAME – 61-64001727\_NASpiritPeriqueRobust84Cx



• This print is to be used for position only. It is not to be used for photographic purposes.

• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



**SURGEON GENERAL'S WARNING:**  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

**SURGEON GENERAL'S WARNING:**  
 Cigarette Smoke Contains Carbon Monoxide.

**SURGEON GENERAL'S WARNING:**  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.



MRM# 1129628

FILE RELEASED  
08.06.15

61-64001727 Natural American Spirit Perique Robust 84mm CPB



**SGS**  
Southern Graphic Systems

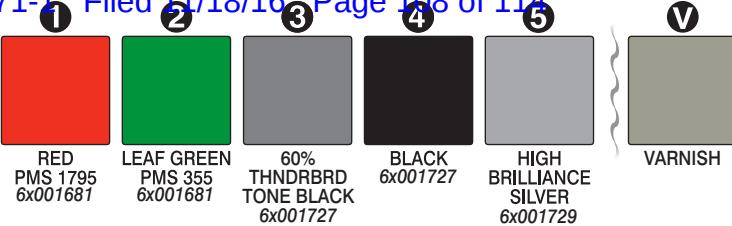
4322 Piedmont Parkway • Greensboro, NC 27410

**DESIGNER: SBJ**

DESIGNER: CHS  
PHONE: 336.369.4733

REFERENCE ART: ALT

DRAWING & ISSUE DATE — SFCX1\_A 12-13-13  
DRAWING DESCRIPTION — Santa Fe FTB KS  
MATERIAL — Board Stock  
SOFTWARE — Illustrator CS5  
COLOR STANDARD — 141264  
PROJECT # — 4026164  
ART PRODUCTION DATE — 12.08.14  
FILE NAME — 61-64001727\_NASpiritPeriqueRobust84Cx



REFERENCE ART:	ALTERATIONS TO ART:	ART LOCATED IN:
•61-64001679	•Addition of PEFC logo •Back Panel Redesign	Design/SGS Released Art/RJR Released Art/Santa Fe Natural Tobacco Company/American Spirit/Boxes

- This print is to be used for position only. It is not to be used for photographic purposes.
- Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
  - Futura Std
  - Helvetica Neue LT Std

**CLIP ART:**

- N/A



**SURGEON GENERAL'S WARNING:**  
Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

**SURGEON GENERAL'S WARNING:  
Cigarette Smoke Contains Carbon Monoxide.**

**SURGEON GENERAL'S WARNING:  
Smoking Causes Lung Cancer, Heart Disease,  
Emphysema, And May Complicate Pregnancy.**

**MRM# 1129628**

FILE RELEASED  
08.06.15

61-64001727 Natural American Spirit Perique Robust 84mm CPB



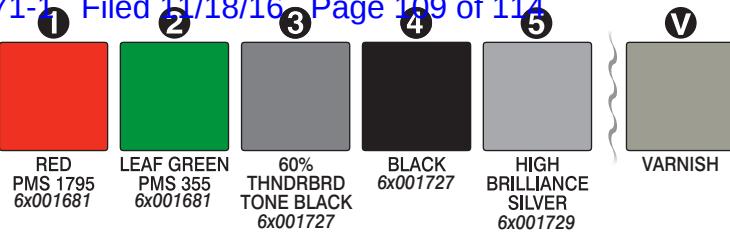
Southern Graphic Systems

4322 Piedmont Parkway • Greensboro, NC 27410

DESIGNER: SRJ

PHONE: 336.369.4733

DRAWING & ISSUE DATE – SFCX1\_A 12-13-13  
 DRAWING DESCRIPTION – Santa Fe FTB KS  
 MATERIAL – Board Stock  
 SOFTWARE – Illustrator CS5  
 COLOR STANDARD – 141264  
 PROJECT # – 4026164  
 ART PRODUCTION DATE – 12.08.14  
 FILE NAME – 61-64001727\_NASpiritPeriqueRobust84Cx



• This print is to be used for position only. It is not to be used for photographic purposes.

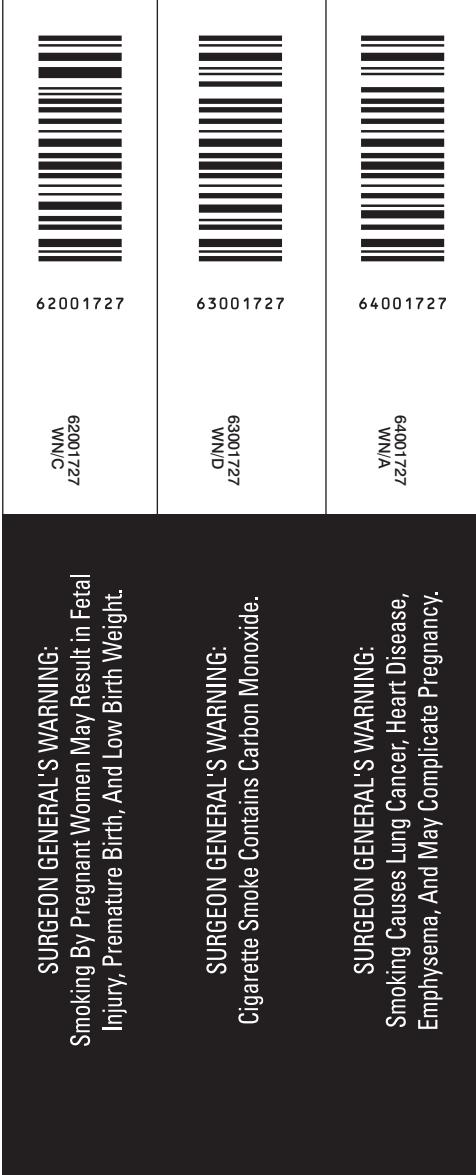
• Colors used on this print are not accurate. They represent a best effort to approach actual colors.

## FONTS:

- Albertus
- Futura Std
- Helvetica Neue LT Std

## CLIP ART:

- N/A



**SURGEON GENERAL'S WARNING:**  
 Smoking By Pregnant Women May Result in Fetal Injury, Premature Birth, And Low Birth Weight.

**SURGEON GENERAL'S WARNING:**  
 Cigarette Smoke Contains Carbon Monoxide.

**SURGEON GENERAL'S WARNING:**  
 Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

MRM# 1129628

FILE RELEASED  
08.06.15

61-64001727 Natural American Spirit Perique Robust 84mm CPB



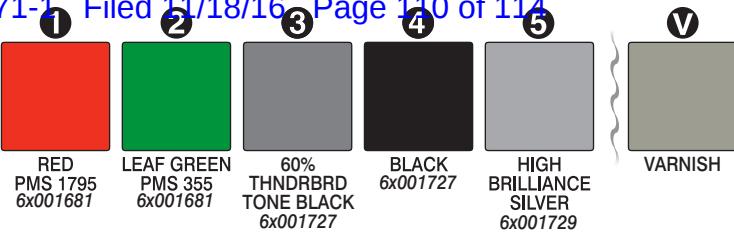
Southern Graphic Systems

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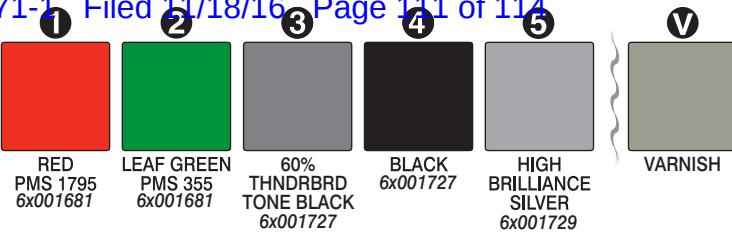
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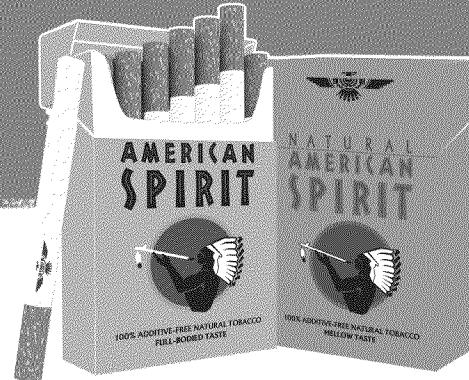
FILE RELEASED  
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# Exhibit 16



GET YOUR TRIAL OFFER. CODE: 999999  
TryAmericanSpirit.com 1-800-435-5515

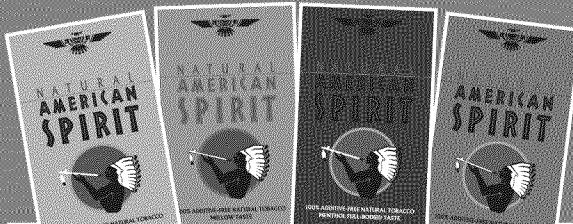
Trial offer restricted to U.S. smokers 21 years of age or older. Offer void in MA and where prohibited. Additional restrictions may apply.



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WHEN YOU WORK WITH THE BEST MATERIALS, YOU DON'T NEED TO ADD ANYTHING ELSE. THAT'S WHY WE USE ONLY TOBACCO AND WATER.

WE STICK WITH PREMIUM QUALITY, WHOLE LEAF NATURAL TOBACCO THAT'S 100% ADDITIVE-FREE FOR A VERY SIMPLE REASON – IT'S ALL WE NEED.



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Trial offer restricted to U.S. smokers 21 years of age or older. Offer void in MA and where prohibited. Additional restrictions may apply.

No additives in our tobacco does **NOT** mean a safer cigarette.

SURGEON GENERAL'S WARNING: Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.